

# Water Compliance Inspection Report

## Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES						yr/mo/day			Inspection Type		Inspector		Fac Type						
1	N		A	K	R	0	6	A	D	2	6	1	7	0	8	2	9	-	R	2	
Remarks																					
21																					
Inspection Work Days		Facility Self-Monitoring Evaluation Rating						BI		QA		<del>Reserved</del>									
67							69	70			71		72		73		74		75		80

## Section B: Facility Data

<b>Name and Location of Facility Inspected</b> <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i>  <b>Vigor Alaska Ketchikan</b> 3801 North Tongass Ave Ketchikan, AK 99901	<b>Entry Time/Date</b> 8/29/17 9:20AM	<b>Permit Effective Date</b> 4/1/15
	<b>Exit Time/Date</b> 8/29/17 5:10PM	<b>Permit Expiration Date</b> 3/31/20
<b>Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)</b>  <b>Russ Page, Environmental Safety and Health Manager</b> Vigor Alaska, LLC 907-228-5306 Russell.Page@vigorindustrial.com	<b>Other Facility Data</b> <i>(e.g., SIC NAICS, and other descriptive information)</i>  SIC: 3731	
<b>Name, Address of Responsible Official/Title/Phone and Fax Number</b>  <b>Russ Page, Environmental Safety and Health Manager</b> Vigor Alaska, LLC 3801 North Tongass Ave, Ketchikan, AK 99901 907-228-5306	<b>Contacted</b> <input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No	




## Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

## Section D: Summary of Findings/Comments

*(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)*

SEV Codes	SEV Description
• • • • •	_____
• • • • •	_____
• • • • •	_____
• • • • •	_____

Name(s) and Signature(s) of Inspector(s) Sandra Brozuský 	Agency/Office/Phone and Fax Numbers EPA/OCE 206-553-5317	Date 9/6/17
Joseph Roberto 	EPA/OCE 206-553-1669	
Signature of Management/QA Reviewer 	Agency/Office/Phone and Fax Numbers EPA/OCE/MIREU 3-0855	Date 3/24/18

ICIS.  
09/07/17 JBr

# INSTRUCTIONS

## Section A: National Data System Coding (i.e., PCS)

**Column 1: Transaction Code:** Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

**Columns 3-11: NPDES Permit No.** Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

**Columns 12-17: Inspection Date.** Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

**Column 18: Inspection Type\*.** Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	! Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

**Column 19: Inspector Code.** Use one of the codes listed below to describe the *lead* agency in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B — EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L — Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

**Column 20: Facility Type.** Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

**Columns 21-66: Remarks.** These columns are reserved for remarks at the discretion of the Region.

**Columns 67-69: Inspection Work Days.** Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

**Column 70: Facility Evaluation Rating.** Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

**Column 71: Biomonitoring Information.** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Column 72: Quality Assurance Data Inspection.** Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

**Columns 73-80: These columns are reserved for regionally defined information.**

## Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

## Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

## Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

\*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

**NPDES  
Inspection Report**

**Vigor Alaska, LLC  
(Vigor Alaska Ketchikan)**

**(APDES Permit: AKR06AD26)**

**Ketchikan, AK**

**August 29, 2017**

**Prepared by:**

**Sandra Brozusky  
Environmental Protection Agency, Region 10  
Office of Compliance and Enforcement  
Multimedia Inspection and RCRA Enforcement Unit**



**Table of Contents**

- I. Facility Information
- II. Inspection Information
- III. Scope of Inspection
- IV. Inspection Entry
- V. Compliance History
- VI. Facility Description/Background
- VII. Permit Information
- VIII. Permit Applicability and Requirements
- IX. Facility Tour
- X. Records Review
- XI. Stormwater Generation, Treatment and Discharge
- XII. Receiving Water
- XIII. Areas of Concern
- XIV. Closing Conference

**Attachments**

- A. Facility Aerial Images
- B. Photograph Documentation
- C. SWPPP Site Map
- D. Stormwater Pollution Prevention Plan
- E. Notice of Intent and Permit Coverage Letter
- F. ADEC June 12, 2013 Inspection Report
- G. Visual Assessment Documentation Example



## Vigor Alaska Ketchikan- NPDES Inspection Report

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Russ Page, Greg Howe or from observations during the inspection.)

### I. Facility Information

Facility Name: Vigor Alaska Ketchikan (facility; Vigor)

Business Owner: Vigor Alaska, LLC  
Note that the property owner and lessor is the Alaska Industrial Development and Export Authority (AIDEA).

Operator: Vigor Alaska, LLC  
Note that Vigor operates and manages this shipyard under an agreement with AIDEA.

Facility Contact(s):

Name	Title	Phone Number	Email Address
Russ Page	ESH Manager	907-228-5306	<a href="mailto:Russell.Page@vigorindustrial.com">Russell.Page@vigorindustrial.com</a>
Dylan Kiefer	Yard Superintendent (taking over environmental program from Russ)	907-228-5306	<a href="mailto:Dylan.Kiefer@vigorindustrial.com">Dylan.Kiefer@vigorindustrial.com</a>
Greg Howe	Dockmaster/ Facilities Manager	907-228-4358	<a href="mailto:Greg.howe@vigorindustrial.com">Greg.howe@vigorindustrial.com</a>
Yohl Howe	General Manager	907-225-7199	<a href="mailto:Yohl.Howe@vigorindustrial.com">Yohl.Howe@vigorindustrial.com</a>

Physical Address: 3801 N. Tongass Ave  
Ketchikan, AK 99901

Correspondence: Attn: Russ Page  
3801 N. Tongass Ave  
Ketchikan, AK 99901

GPS Coordinates: +53.342222°/-131.646111°  
(Obtained from the Notice of Intent)

Receiving Water: Tongass Narrows

Permit #: AKR06AD26

Number of Employees: There are approximately 202 employees at this plant

Length of Operation: Vigor Alaska Inc. has operated at this terminal since 2012.

## II. Inspection Information

<b>Inspection Date(s)</b>	August 29, 2017
<b>Time Arrived</b>	9:20 AM
<b>Time Departed</b>	5:10 PM
<b>Weather Condition</b>	Clear
<b>Facility Representative(s) Present</b>	Russ Page and Dylan Kiefer
<b>EPA Inspector Present (Inspection Team)</b>	Sandra Brozusky (Lead Inspector) Joe Roberto
<b>Observed Discharge</b>	I did not observe any stormwater discharge during this inspection.

## III. Scope of Inspection

The primary focus of this inspection was to conduct a compliance evaluation inspection to determine compliance with the Alaska Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) and Section 402 of the Clean Water Act. For this facility, this meant evaluating the management of stormwater at the site.

In general, this inspection consisted of an opening conference to discuss the purpose and expectations of the inspection, a facility tour to inspect potential stormwater impacted areas, a records review, and a closing conference to discuss the areas of concern identified during the inspection.

I (Sandra Brozusky) did not collect samples at the time of this inspection.

## IV. Inspection Entry

Specifics regarding entry at this facility are as follows:

- This was an unannounced inspection.
- I presented credentials to Mr. Page upon arriving at the facility.
- I explained to Mr. Page that this visit was a compliance inspection to determine compliance with the MSGP and the Clean Water Act.
- Mr. Page did not deny me access to the facility.
- Mr. Page accompanied me throughout the inspection.
- I was allowed to inspect all areas of the facility I wished to inspect.



**V. Compliance History**

Date of Last Inspection: According to ADEC records, this facility was last inspected for compliance with the MSGP on June 12, 2013. This inspection was conducted by ADEC. See Attachment F for a copy of this inspection report.

Enforcement Actions: According to ADEC records, this facility has not been issued any penalty or compliance orders for purposes of compliance with the MSGP.

**VI. Facility Description/Background**

Vigor is a dry dock shipyard, providing a variety of ship building and ship repair services. The facility has two dry docks and one pier. The dry docks are used to conduct vessel repair and maintenance activities that cannot be conducted while the vessel is waterborne. These activities include exterior hull repair and preservation (e.g. blasting and painting) below the waterline.

According to the facility's SWPPP, the shipyard provides a variety of ship building and ship repair services including structural repair, sheet metal fabrication, machinery overhaul, piping and boiler repair and overhaul of shipboard components.

This facility covers approximately 10 acres and is located directly adjacent to Tongass Narrows.

**VII. Permit Information**

At the time of the inspection, the facility was covered under the ADEC MSGP (Permit #AKR06AD26). See Attachment E for a copy of the permit coverage letter dated September 28, 2015 and the Notice of Intent (NOI). The permit became effective April 1, 2015.

According to the NOI, the facility had prior MSGP coverage under permit #AKR05CD63.

This facility also maintains an individual permit (AK0045675) to discharge process wastewater generated from the dry docks. This wastewater includes dry dock deck wastewater (also stormwater collected on the deck), ballast water and floodwater. This wastewater discharges into Tongass Narrows.

Vigor also maintains an agreement with the City of Ketchikan to send bilge water to the Charcoal Point WWTP, in Ketchikan.

### **VIII. Permit Applicability and Requirements**

The facility's NOI for coverage under the MSGP indicates that the Standard Industrial Classification (SIC) code for the activity conducted at this facility is 3731 (Ship Building and Repairing). According to Appendix D of the MSGP, facilities that fall under SIC code 3731 are eligible for permit coverage under the MSGP. See Attachment E for a copy of the NOI submitted by this facility for coverage under the MSGP.

Based on the facility's primary SIC code, the facility is subject to sector-specific requirements included in Sector R – Ship and Boat Building and Repair of the MSGP.

Coverage under the MSGP means that this facility is responsible for complying with MSGP requirements including the following:

- Prepare a SWPPP to cover stormwater related activities at the facility as established in Part 5 of the MSGP.
- Conduct and document routine facility inspections as established in Part 6.1 of the MSGP. These routine facility inspections must be conducted at least quarterly.
- Conduct and document a quarterly visual assessment of stormwater discharges as established in Part 6.2 of the MSGP. These visual assessments must be conducted quarterly.
- As applicable to specific industrial sectors, conduct quarterly benchmark monitoring as established in Part 7 of the MSGP. Sector R does not have benchmark monitoring requirements.
- Prepare and submit MSGP discharge monitoring reports (MDMRs) which document the results of quarterly benchmark monitoring as established in Part 9.1 of the MSGP. This facility is not subject to benchmark monitoring.
- Perform corrective actions when conditions established in Part 8 of the MSGP occur.
- Prepare and submit an annual report to ADEC that documents, among other things, the corrective actions conducted during the calendar year as established in Part 8.4 of the MSGP.

These listed permit requirements were the primary focus of the inspection. Where deficiencies were observed, I have documented them in the "Areas of Concern" section of this report.

## **IX. Facility Tour**

During the facility tour I examined all areas occupied by this facility including the material storage areas, the dry docks stormwater drainage pathways, fuel storage areas, stormwater collection systems, and the stormwater outfall locations. See Attachments A and C for overviews of the facility.

## **X. Records Review**

As part of the inspection, I requested that the following documents be produced for review:

- **NPDES Permit** – At the time of the inspection, Mr. Page produced a copy of the MSGP.
- **SWPPP** – At the time of the inspection, I was provided with a SWPPP dated September 24, 2015. See Attachment D for a copy of the SWPPP.
- **Routine Facility Inspection Reports** – At the time of inspection, I requested to see routine facility inspection reports since the facility was issued a permit in September 2015. The facility could not produce any routine facility inspection reports for this time period. See the “Areas of Concern” section of this report for details regarding visual assessment reports.
- **Quarterly Visual Assessment Reports** – At the time of inspection, I requested to see quarterly visual assessment reports since the facility was issued a permit in September 2015. Facility representatives were able to provide these records.
- **Annual Reports** – At the time of inspection, I requested to see annual reports for 2015 and 2016. Mr. Page provided annual reports for this time.

Note that the review of the above documents was not a comprehensive review designed to identify all deficiencies. Rather, the review of these documents was more cursory in nature.

## **XI. Stormwater Generation, Treatment and Discharge**

The operation of this facility is such that the bulk of the discharge from this facility is stormwater resulting from precipitation falling within the footprint of the facility. Stormwater discharging from the facility is routed to Tongass Narrows. A majority of the facility is paved, relatively flat and contains a number of catch basins to route stormwater to the outfalls.

The facility’s SWPPP identifies eight outfalls, however, based on conversations, a newer site map and observations at the time of inspection, Vigor has four outfalls. These are

identified as Outfall 1 – 4. See Attachment C for a copy of the facility site map showing these four outfalls. This site map also contains my hand-written notes marking the location of two drains (french drain and an additional drain) observed at the time of the facility tour but not included on the site map or in the SWPPP.

Best management practices include use of catch basin filter socks, oil absorbent socks, sweeping on an as needed basis, established spill kits and routine housekeeping.

## **XII. Receiving Water**

The facility's NOI states that Tongass Narrows is the receiving water. This was also my observation at the time of inspection.

## **XIII. Areas of Concern**

At the time of the inspection I identified several areas of concern. Specifically, the concerns at this facility are identified as follows:

### **A. SWPPP Site Map**

Condition 5.2.3.3 of the MSGP identifies that a site map must be included in the SWPPP. This condition further identifies details that must be included in the site map. Such details include:

- “Locations of all storm water conveyances including ditches, pipes and swales”
- “Locations of storm water inlets and outfalls...”

At the time of the facility tour, I observed a stormwater catch basin and french drain located on the northeast side of the steel shop. These two stormwater drains were **not** identified on the SWPPP site map. At the time of inspection, facility representatives were unsure how these drains routed stormwater. See photograph 3 in Attachment B for a view of these drains. Also see Attachment C for the site map.

### **B. Visual Assessment Collection**

Condition 6.2.1 of the MSGP states, “Once each calendar quarter for the entire permit term, the permittee must collect a storm water sample from each outfall (except as noted in Part 6.2.3) and conduct a visual assessment of each of these samples.” This condition continues to state, “The visual assessment must be made: Of a sample in a clean, clear glass or plastic container and examined in a well-lit area...”

During the inspection, I asked facility representatives how they collected stormwater samples for visual assessment. At this time, they stated that they used a solid plastic container, not a clear container.

**C. Visual Assessment Documentation**

Condition 6.2.2 of the MSGP states, "A permittee must document the results of their visual assessments and maintain this documentation onsite with the SWPPP as required in Part 6.2.3. The permittee is not required to submit their visual assessment findings to DEC, unless specifically requested to do so. At a minimum, the permittees documentation of the visual assessment must include:

- Sample location(s)
- Sample collection date and time, and visual assessment date and time for each sample;
- Personnel collecting the sample and performing visual assessment, and their signatures;
- Nature of the discharge (i.e., runoff or snowmelt);
- Results of observations of the storm water discharge;
- Probable sources of any observed storm water contamination, and
- If applicable, why it was not possible to take samples within the first 30 minutes.
- Quarterly Visual Assessment Documentation must be signed and certified in accordance with Appendix A, Subsection 1.12 of the permit.

At the time of inspection, I requested to see visual assessment documentation. Based on my review, this documentation did not include a signature and certification statement and the sample collection and visual assessment date and time for each sample. See Attachment G for a copy of a visual assessment record.

**D. Routine Facility Inspection Documentation**

Condition 6.1.1 of the MSGP states, "During normal facility operating hours, the permittee must conduct inspections of areas of the facility covered by the requirements in this permit, including the following:

- Areas where industrial materials or activities are exposed to storm water.
- Areas identified in the SWPPP and those that are potential pollutant sources (see Part 5.1.3).
- Areas where spills and leaks have occurred in the past 3 years.
- Discharge points.
- Control measures used to comply with the effluent limits contained in this permit.

Inspections must be conducted at least quarterly (i.e., once each permit quarter), or in some instances more frequently (e.g., monthly), as appropriate."

Condition 6.1.2 of the MSGP states, "A permittee must document the findings of each routine facility inspection performed and maintain this documentation onsite with the SWPPP as required in Part 5.8."

At the time of inspection, I asked the facility representatives if they conducted routine facility inspections. The representatives indicated that they were conducting routine inspections and correcting issues identified, however, they did

not have documentation for these inspections.

#### **XIV. Closing Conference**

Prior to concluding the inspection, I held a closing conference with Mr. Page and Mr. Kiefer. The purpose of this closing conference was to discuss the preliminary findings of the inspection. I discussed the areas of concern listed above and then I thanked them for their time and assistance with the inspection.

**Report Completion Date:**

3/21/18

**Lead Inspector Signature:**

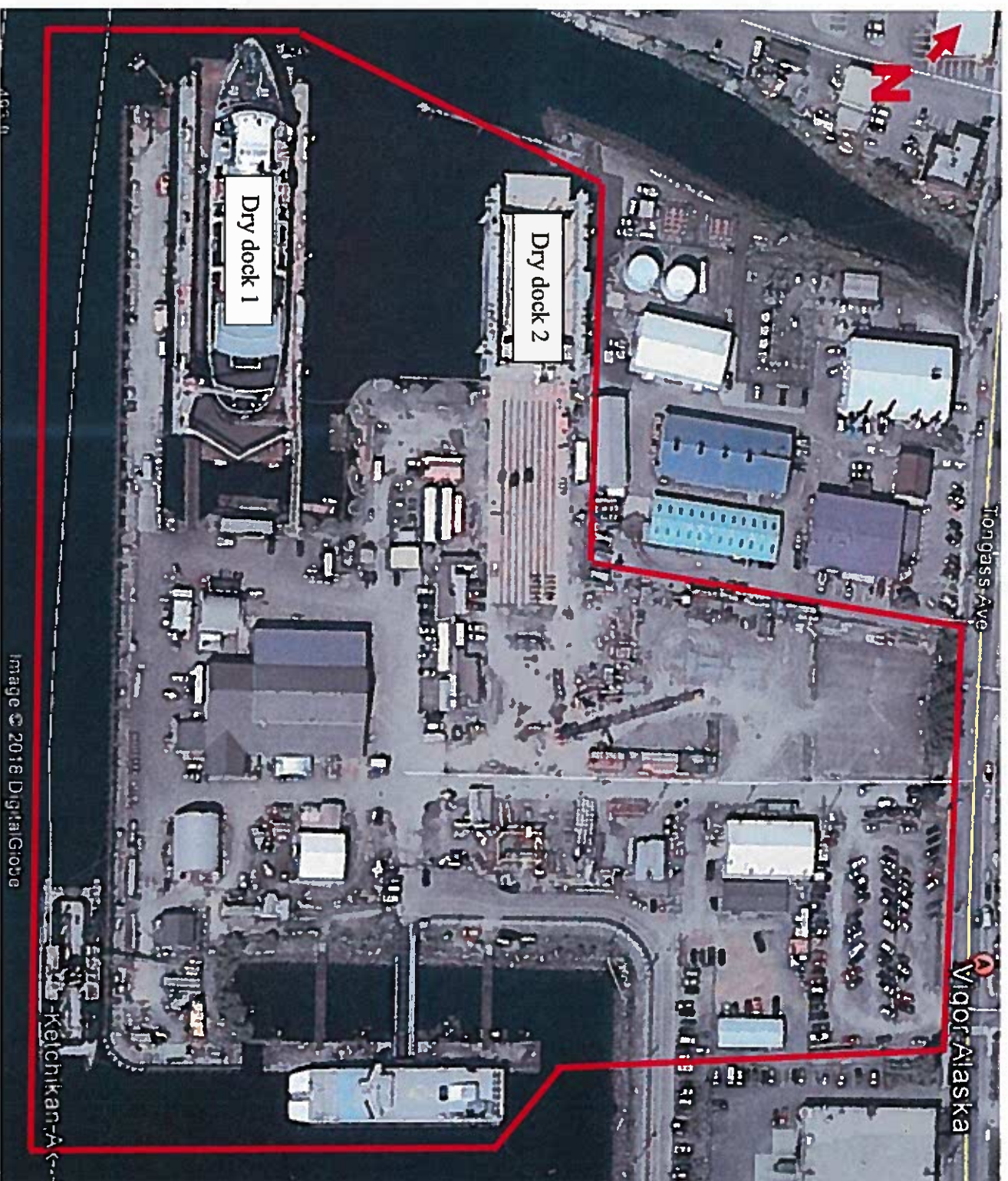
John Dwyer

# **Attachment A Facility Aerial Image**

**Vigor Alaska Ketchikan**









# **Attachment B**

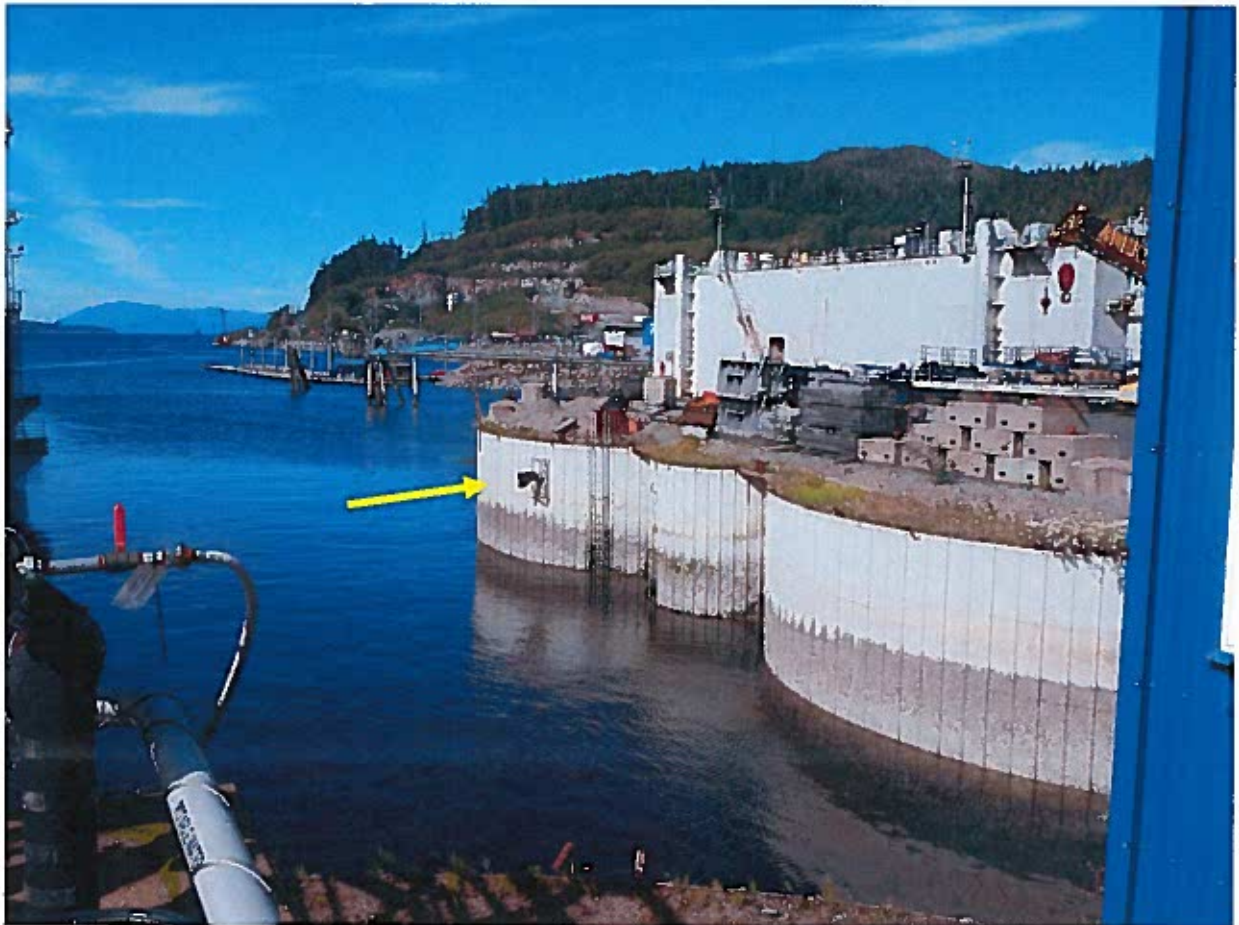
## **Photograph Documentation**

### **Vigor Alaska Ketchikan**

**All photographs were taken by Sandra Brozusky using a Nikon Coolpix AW130**







1. View of outfall #1 located northeast of dry dock 1 (indicated by the yellow arrow). (DSCN0464.jpg)



2. View of drydock 2. Wastewater and stormwater from this dry dock deck will discharge under an individual wastewater permit. (DSCN0465.jpg)





3. View of the french drain (foreground) and catch basin (background) that were not identified in the SWPPP site map or SWPPP. These drains were located just northeast of the steel shop.  
(DSCN0469.jpg)

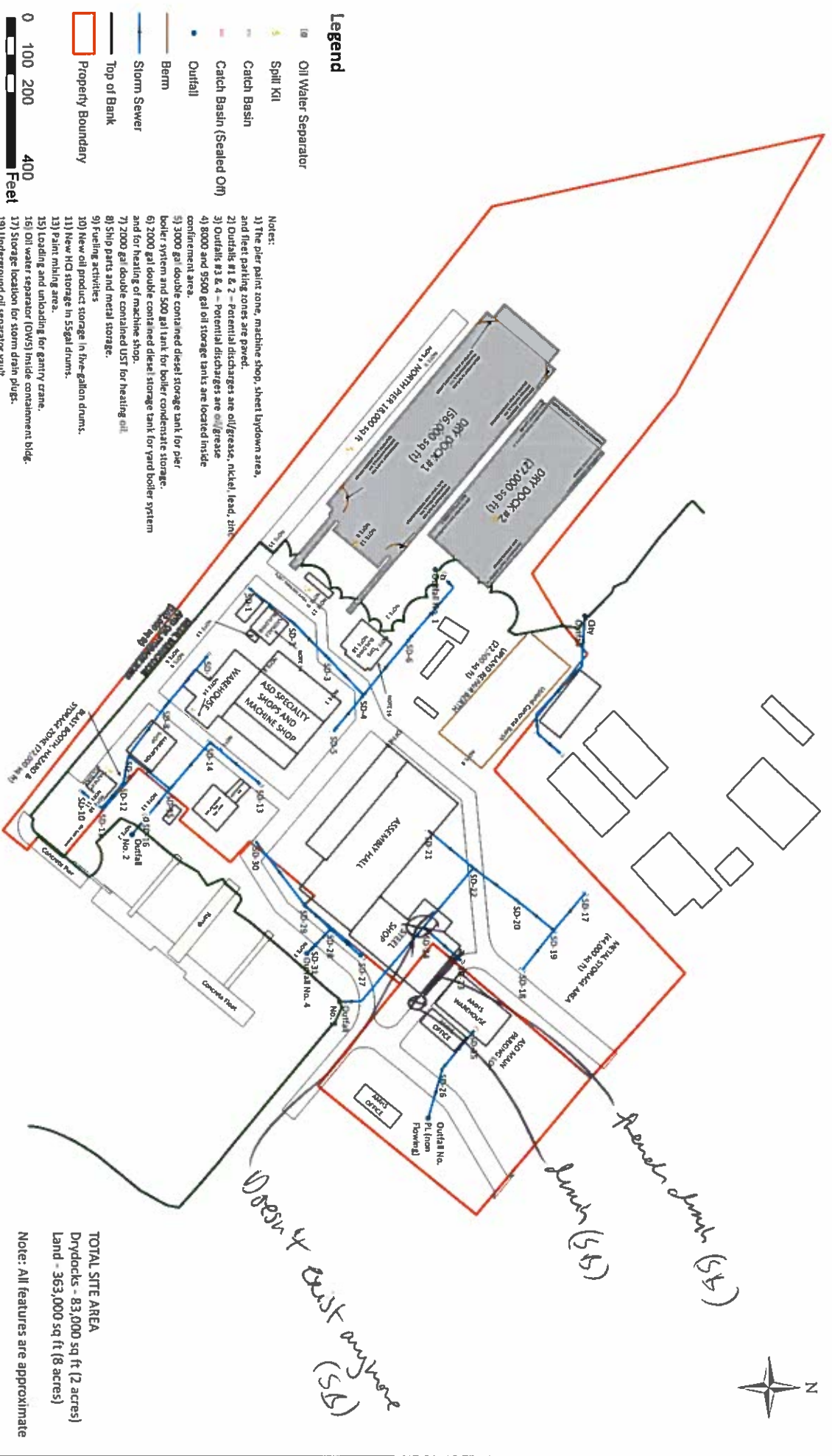




# **Attachment C Facility SWPPP Site Map**

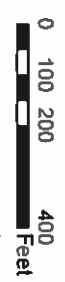
**Vigor Alaska Ketchikan**





# Legend

- Oil Water Separator
- Spill Kit
- Catch Basin
- Catch Basin (Sealed Off)
- Outfall
- Berm
- Storm Sewer
- Top of Bank
- Property Boundary



Notes:

- 1) The pier paint zone, machine shop, sheet laydown area, and fleet parking zones are paved.
- 2) Outfalls #1 & 2 - Potential discharges are oil/grease, nickel, lead, zinc.
- 3) Outfalls #3 & 4 - Potential discharges are oil/grease.
- 4) 8000 and 5500 gal oil storage tanks are located inside confinement areas.
- 5) 3000 gal double contained diesel storage tank for pier boiler system and 500 gal tank for boiler condensate storage.
- 6) 2000 gal double contained diesel storage tank for yard boiler system and for heating of machine shop.
- 7) 2000 gal double contained UST for heating oil.
- 8) Ship parts and metal storage.
- 9) Fueling activities.
- 10) New oil product storage in five-gallon drums.
- 11) New HCl storage in 55gal drums.
- 12) Paint mixing area.
- 13) Paint mixing area.
- 14) Loading and unloading for gantry crane.
- 15) Oil water separator (OWS) inside containment bldg.
- 16) Storage location for storm drain plugs.
- 17) Underground oil separator vault.

## Ketchikan Site Map

K:\Information\Stormwater\PERMITS\Ketchikan\Picture & Map\GIS\KATCHIKTN\_11-17-16\Map.mxd Created by Nathan O'Donohue 07/29/2016

2016

TOTAL SITE AREA  
Drydocks - 83,000 sq ft (2 acres)  
Land - 363,000 sq ft (8 acres)  
Note: All features are approximate

Handwritten Comments:  
SIS 8/22/17

Handwritten notes on map:  
Doesn't exist anymore (55)  
fence line (55)  
line (55)



# **Attachment D**

## **Stormwater Pollution Prevention Plan**

**Vigor Alaska Ketchikan**





## **Storm Water Pollution Prevention Plan**

**for:**

Vigor Alaska (Ketchikan)  
3801 N. Tongass Ave.  
Ketchikan, AK 99901

### **SWPPP Contact(s):**

Russell Page  
3801 N. Tongass Ave.  
Ketchikan, AK 99901  
(907) 228-5306  
[Russell.Page@vigor.net](mailto:Russell.Page@vigor.net)

Tammie Wilson  
5555 N. Channel Ave.  
Portland, OR 97217  
(971) 352-8112  
[Tammie.Wilson@vigor.net](mailto:Tammie.Wilson@vigor.net)

### **SWPPP Preparation Date:**

09/ 24 / 2015

**APDES Permit Tracking Number: AKR06AD26**



## Table of Contents

Introduction .....	Error! Bookmark not defined.
Storm Water Outfalls .....	2
Discharges From The Pier, Drydock, and Facility Zones .....	3
Plan Administrative Requirements .....	3
Implementation Requirements .....	3
Objectives .....	3
Pollution Prevention Planning and Organization .....	4
Existing Vigor Alaska Facility Plans and Review of Other Requirements .....	4
Site Maps .....	5
Material Storage and Handling .....	6
Historical Material Handling .....	7
Potential Pollutant Sources – Industrial Processes .....	7
Surface Preparation .....	7
Primer and Painting Application .....	8
Tank Cleaning .....	8
Mechanical Repairs .....	8
Hydraulic Repairs .....	8
Pipe Fitting .....	8
Waste Liquids From Tanks .....	8
Fueling Operations .....	9
Boiler Cleaning .....	9
Hazardous Wastes Storage .....	9
Waste Segregation, Reclamation, and Recycling .....	9
Potential Pollutant Sources - Material Handling and Storage Areas .....	9
Potential Pollutant Sources - Activities Creating Dust and Particulates .....	10
Significant Spills and Leaks .....	10
Non Storm Water Discharges .....	11
Soil Erosion and Soil Impact .....	13
Risk Assessment of Potential Pollutant Sources .....	13
Drydock .....	15
Pier .....	15
Waste Storage Areas .....	15
Paint Storage Area, Oil Product Storage Area, and Receiving Area .....	16
Admin Offices and Parking Area .....	16
Machine Shop Area .....	16
Sandblasting and Painting Booth Area .....	17
Ship Construction Area .....	17
Oil Storage and Asbestos Decontamination Area .....	17
Summary Of Pollutant Risk .....	17
Stormwater Best Management Practices .....	18
Training and Drills .....	20
Annual Comprehensive Site Compliance Evaluation .....	21
SWPPP Revisions .....	22
Runoff Management .....	22
Monitoring and Reporting .....	23
Review of Rare and Endangered Species and Critical Habitat .....	23
Certifications .....	24





## Appendixes

### Appendix A – Site Maps

Figure One - Site Map

Figure Two- Drainage and Zone Map

### Appendix B - Historical Spills

### Appendix C - Revisions

### Appendix D - Quarterly Examination Forms

### Appendix E – Site Inspection Monitoring Forms

### Appendix F - Storm Water Monitoring Plan

### Appendix G - Endangered and Threatened Species List

### Appendix H - MSGP Permit



## Facility Information

Vigor Alaska, a Vigor Industrial Company, is located on the Pacific Coast, west of Tongass Avenue in Ketchikan, Alaska. The facility is adjacent to the Tongass Narrows in Southeast Alaska on approximately eight acres of land and 1,600 feet of shoreline. An additional 20,000 square feet of land east of the shipyard includes a parking lot. One acre of the property is not exposed to storm water due to roofed areas or buildings. Vigor Alaska utilizes one pier and two dry docks extending from the shore on the north side of the property. The dry docks and upland maintenance pad are used to conduct repair and maintenance activity which cannot normally be conducted while a vessel is waterborne. These activities generally include exterior hull repair, preservation (abrasive blasting, hydro washing, and painting), and repair of valves and fittings located below the waterline.

Alaska Industrial Development and Export Authority (AIDEA) are the owner and lessor of the property. Vigor Alaska operates and manages this shipyard under an agreement with AIDEA. Improvements to the land portion of the lease include production shops, machine shop, sand blast booth, paint booth, hazardous waste storage shop, warehouse, and administrative offices. Existing facilities allow the repair and overhaul of several oceangoing vessels at any given time.

The shipyard provides a variety of ship building and ship repair services, including structural repair, sheet metal fabrication, surface preparation (sandblasting and scaling), painting, electrical component repair, machinery overhaul and repair, piping and boiler repair, bilge and ballast water treatment, lagging and insulation removal and installation, and overhaul and rigging of shipboard components.

Surrounding land uses are marine related industrial and transportation. To the south and east is the AMHS (Alaska Marine Highway System) offices; to the north is the Ketchikan Public Utilities sewer treatment plant; fronting the facility on the east is Tongass Avenue and A/P Grocery store; bordering on the west and south is the Tongass Narrows.

### Facility Information

Name of Facility: Vigor Alaska (Ketchikan)

Street: 3801 N. Tongass Ave

City: Ketchikan

State: AK

ZIP Code: 99901

Permit Tracking Number: AKR06AD26 (if covered under a previous permit)

Latitude/Longitude (Use one of three possible formats, and specify method)

Latitude:

Longitude:

1. 55° 21' 24" N (degrees, minutes, seconds)

1. - 131° 41' 49" W (degrees, minutes, seconds)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale: \_\_\_\_\_)

☐ EPA Web site

☐ GPS

☒ Other (please specify): Previous Permit

Is the facility located in Indian Country? ☐ Yes ☒ No

If yes, name of Reservation, or if not part of a Reservation, indicate "not applicable." \_\_\_\_\_



Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to storm water: 16.5 (acres)

### Discharge Information

Does this facility discharge storm water into an MS4? ☐ Yes ☒ No

If yes, name of MS4 operator: \_\_\_\_\_

Name(s) of water(s) that receive storm water from your facility: Tongass Narrows

Are any of your discharges directly into any segment of an "impaired" water? ☐ Yes ☒ No

If Yes, identify name of the impaired water (and segment, if applicable): \_\_\_\_\_

Identify the pollutant(s) causing the impairment: \_\_\_\_\_

For pollutants identified, which do you have reason to believe will be present in your discharge? \_\_\_\_\_

For pollutants identified, which have a completed TMDL? \_\_\_\_\_

Are any of your storm water discharges subject to effluent guidelines? ☐ Yes ☒ No

If Yes, which guidelines apply? \_\_\_\_\_

Primary SIC Code or 2-letter Activity Code (refer to Appendix D of the 2015 MSGP): \_\_\_\_\_

Identify your applicable sector and subsector: R- Ship and Boat Building and Repair, Subsector R1

### Storm Water Outfalls

Nine storm drains and the new upland repair pad convey storm water to the west outfalls (outfall number SW1 and SW3) through an underground oil water separator. Nine storm drains convey storm water to the east outfall (outfall number SW2) through an underground oil water separator. New locations of major structures and storm drains are shown on Figure One (Vigor Alaska Ketchikan Site Map, Appendix A). Six storm drains are located at the new parking lot areas. The parking lot storm drains discharge to the east, beside the U.S. Post Office ditch (outfall number SW-PL and SW-City). Shipbuilding and metal staging operations are conducted at the north and central areas of the property. Eight storm drains discharge storm water from this area to the shoreline east of the property (outfall number SW6). Ten new storm drains were constructed at the fabrication and metal staging area in 2012. These new storm drains discharge to outfall numbers SW3, SW4, and SW5. Non-impacted storm water from the dry dock number 1 (DD1) and dry dock number 2 (DD2) are monitored as outfall number SW7 and SW8, respectively. Non-impacted storm water from the upland repair pad will be monitored at outfall SW1. Impacted industrial storm water from the dry docks and upland repair berth will be collected and treated under an individual NPDES discharge permit. The dry dock NPDES general discharge permit will be renewed May 31<sup>st</sup> 2017. A new wastewater treatment system was constructed at Vigor Alaska to collect, store and treat wastewater for the NPDES permitted



## discharge.

These storm water outfalls (Figure Two, Appendix A) discharge storm water every month of the year. Storm water from the parking lot normally infiltrates into the ground prior to discharging. Figure Two shows the drainage patterns and storm drain locations. Impacted storm water from the warehouse now flows overland to three new drains at the property boundary. The cities storm water outfalls to the marine water next to the new dry dock (DD2) position.

## Discharges from the Pier, Dry docks, and Facility Zones

Zones have been delineated to indicate structures and work types occurring in certain areas of the facility. The designated facility industrial zones discharge storm water from the following approximate areas:

Pier	18,000 square feet
Dry dock -1	42,000 square feet (56,000 with apron, deck, wing walls)
Dry dock -2	20,000 square feet (new in 2009, 27,000 with apron, deck, wing walls)
Upland berth pad	22,500 square feet (new in 2007)
Parking lot & admin offices	40,000 square feet (parking lot is not an industrial area)
Shipbuilding area & fab hall	74,000 square feet (including 3,500 square feet for roofs and pad)
Shipbuilding/metal storage	30,000 square feet
Machine/fabrication zone	102,000 square feet (including 24,000 roofed square feet)
Paint storage/handling zone	8,000 square feet (including 2,000 roofed square feet)
Blast booth area	30,000 square feet (including 3,000 roofed square feet)
Hazardous waste area	30,000 square feet (including 3,000 roofed square feet)
Used oil storage area	7,000 square feet (including 2,000 roofed square feet)

## Plan Administrative Requirements

### Implementation Requirements

Vigor Alaska filed storm water NOI (Notice of Intent) to comply with the General Storm water Permit. The facility is authorized to discharge storm water associated with multi-sector activity under the terms and conditions imposed by the EPA's NPDES Multi-sector Storm water General Permit (MSGP, permit number AKR060000, tracking number AKR06AD26. Vigor Alaska developed and implemented a storm water pollution prevention plan (SWPPP) and updated storm water Best Management Plan (BMP). The Storm Water Monitoring Plan (SWMP) is attached to the SWPPP.

### Objectives

The SWPPP has two main objectives. Vigor Alaska has identified and evaluated sources of pollutants associated with industrial activities that may affect the quality of storm water discharges and authorized non-storm water discharges from the facility. Vigor Alaska has also identified and implemented site-specific BMPs to reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges.



## Pollution Prevention Planning and Organization

Vigor Alaska has a pollution prevention team comprised of personnel from various pertinent departments and trades. Table One identifies the personnel and responsibilities of each member.

**Table One – Pollution Prevention Team**

Name and Title	Department	Responsibilities
<b>Tammie Wilson</b> Stormwater Manager 5555 N. Channel Ave. Portland, OR 97217 (971) 352-8112 tammie.wilson@vigor.net	Environmental	Main SWPPP contact. Stormwater Manager for all of Vigor's facilities in Alaska. Conducts annual inspections, updates SWPPP as needed, and manages stormwater improvements at the facility.
<b>Russell Page</b> Environmental Director 3801 N. Tongass Ave. Ketchikan, AK 99901 (907) 617-4718 russell.page@vigor.net	Environmental and Safety Department	Chair the Pollution Prevention Team Meetings. Oversee the implementation of the SWPPP. Conduct inspections and ensure that all requirements of the BMPs and SWPPP are met.
Technical Group Supervisor, Metals and HazMat	Tech Department	Assist with the implementation of the SWPPP and BMPs. Serve as advisor on storm water pollution issues. Attend the BMP team meetings.
Coating Manager Robin Nielson	Coating Department	Attend BMP meetings. Give input and suggestions to prevent fugitive paint and blast grit.
Greg Howe- Dock master and Marine Group Manager	Dry dock and Marine Area	Serve as dry dock inspector and advisor. Ensure dry dock and marine requirements of the SWPPP are met. Attend BMP meetings.
Leo Besaw -Production Manager Mike Pearson – General Manager	Vigor Alaska Management	Oversight of Vigor Alaska supervisors. Assist with the implementation of the SWPPP and BMPs

### Facility Owner

Alaska Industrial Development and Export Authority (AIDEA)  
John Springsteen, Executive Director  
813 W. Northern Lights Blvd.  
Anchorage, AK 99503  
(907) 771-3000  
jspringsteen@aidea.org

## Existing Vigor Alaska Facility Plans and Review of Other Requirements

Several contingency plans, management/monitoring plans, and permits are incorporated into Vigor Alaska policy. Elements of the following plans and permits presently exist at the facility:





- Spill Prevention Control and Countermeasures Plan (SPCC)
- Industrial Sewer Discharge Permit
- Dry dock APDES Individual Permit (AK-004567-5)
- Storm water APDES MSG Permit (AKR06AD26), renewal)
- Best Management Practices Plan
- Facility Operations Manual for Bulk Oil Transfers
- Facility and Vessel Plan – Emergency Response Plan
- Lead Health and Safety Plan
- Hazardous Waste Management Plan

The training, prevention, and spill response requirements for these plans and permits are pertinent to the goals of the SWPPP.

### Site Maps

Vigor Alaska site maps are attached in Appendix A. These maps identify the general topography, surface water bodies, storm water discharge points, structural control measures affecting storm water discharges, impervious and paved areas, locations where materials are stored, and areas of industrial activity.

**Table Two – Vigor Alaska Material Storage and Handling**

Location	Material	Stored Quantity	Shipped Quantity	Handled Quantity
Two Dry docks	Hydro wash Water			3000 gal/month
	Paint			300 gal/month
	Paint Debris			60 lb/month
	Corrosives			
	Abrasives		40,000 lb/month	50,000 lb/month
	Solvents			20 gal/month
	Oily Water	5000 gal/month		5,000 gal/month
	Oily Debris and Oily Sludge			900 lb/month
	Fuels			30 gal/month
	Lead Paint			
Pier	Fuels (boiler system)	3000 gal/month		3000 gal/month
	Lubricants	8 gal/month		8 gal/month
	Abrasive Grit			1500 lb/month
	Solvents			50 gal/month
	Corrosives			1 gal/month
	Paint			20 gal/month
	Materials with Lead			200 lb/month
Paint Department	Paint	800 gal/month		300 gal/month



Vehicle Maintenance	Solvents	200 gal/month		30 gal/month
	Resins			
	Antifreeze			5 gal/month
	Gasoline			1400 gal/month
	Brake Fluid			
	Grease			
	Oil			

## Material Storage and Handling

Table Two describes the locations, approximate quantities, and frequency where raw materials, intermediate products, recycled materials, and waste materials are stored, shipped, or handled. Stored materials are quantified as materials that are stored in one location longer than 24 hours. Shipped materials are materials that are shipped off-site to landfills, sewer system, TSD facility (treatment, storage and disposal facility), or recycling facilities.

**Table Two – Vigor Alaska Material Storage and Handling (continued)**

Location	Material	Stored Quantity	Shipped Quantity	Handled Quantity
Hazardous Waste Storage And Used Oil Storage	Grease	5 gal/month	5 gal/month	5 gal/month
	Paint	300 gal/month	300 gal/month	300 gal/month
	Solvent	90 gal/month	20 gal/month	90 gal/month
	Solvent Recycled	60 gal/month		60 gal/month
	Oily Water	4000 gal/month	3300 gal/month	4000 gal/month
	Oily Debris	6 lb/month	6 lb/month	6 lb/month
	Oily Rags Recycled	400 lb/month	400 lb/month	400 lb/month
	Waste Oil	2000 gal/month	2000 gal/month	2000 gal/month
	Oily Sludge	50 gal/month	50 gal/month	50 gal/month
	Antifreeze	50 gal/month	50 gal/month	50 gal/month
	Gasoline	200 gal/month	200 gal/month	200 gal/month
	Leaded Waste Debris and Paint	2 lb/month	2 lb/month	2 lb/month
Blast Booth	Bulbs with Mercury	1 lb/month	1 lb/month	1 lb/month
	Abrasive Grit	2,000 lb/month	2,000 lb/month	2,000 lb/month
Machine Shop	Oil	15 gal/month		15 gal/month
	Lubricants	15 gal/month		15 gal/month
	Corrosives	7 gal/month		7 gal/month
	Paint			
	Oily Debris			3 lb/month
	Waste Oil			15 gal/month
	Solvents			15 gal/month
	Resins			
	Antifreeze			2 gal/month



	Gasoline			
	Fuel (heating)	2000 gal/month		2000 gal/month
	Grease			5 gal/month

### Historical Material Handling

All spills in the hazardous storage area containment are always promptly cleaned up. No fugitive spilled materials migrated out of the containment system. The new hazardous waste storage building is located at the south portion of the property and has full interior containment. As described in this SWPPP, the structure is roofed and has a concrete containment system.

## Potential Pollutant Sources – Industrial Processes

### Surface Preparation

#### Abrasive Blasting

To prepare ship hulls and other surfaces for new paint, it is necessary to remove old paint and primer from the surfaces. Removal of coatings may be accomplished by abrasive grit media (copper slag or aluminum oxide). Anti-foul paints removed may contain small amounts of toxic substances such as copper, zinc. Spent abrasive from these operations may also contain some amounts of toxic substances. Typical wastes generated may include marine fouling organisms, paint chips, spent abrasive, and metal contaminated debris.

Abrasive blasting may be performed on hulls, inside tanks, or top-side on weather decks, flight decks, or superstructures. Temporary containment may be erected for abrasive blasting operations performed top side and pier-side on any vessel.

Abrasive blasting is also performed in designated areas where containment is permanent, or where containment structures have been erected for a specific job. Areas at Vigor Alaska designated for such activities include the sandblast booth where abrasive blasting takes place inside a building which is enclosed to contain the blast grit.

#### Hydro washing

Hydro washing is conducted at Vigor Alaska and is utilized to prepare surfaces for new coating systems. Hydro wash water pressure can range from 2,000 to 25,000 psi. The wastewater generated from this activity may contain some measurable amount of biological material and metals as identified above. Typical quantities of wastewater resulting from this operation can be as much as 2,000 gallons for the underwater hull of a large vessel.

#### Dry dock Discharge Monitoring

Discharges from the Vigor Alaska dry dock flooding, hydro washing, ballast tanks, and bilge tanks are





permitted and monitored under a NPDES discharge permit. Vigor Alaska samples and analyzes the effluent water during every regulated event per NPDES permit requirements. Vigor Alaska also samples and tests every regulated batch of ballast water and bilge water that is discharged. Vigor Alaska samples the floodwater inside the dry dock at least once a month when the water is above the dry dock blocks. The water laboratory testing is performed under NPDES permit conditions and requirements. Vigor Alaska will contain and collect wastewater, within washing and repair areas, for analytical testing and eventual treatment to permitted discharge levels. Vigor Alaska constructed a wastewater treatment system on the dry dock in order to comply with wastewater discharge limits.

### **Primer and Painting Application**

Paint and Primer is applied by brushes, rollers, HVLP spray guns, and airless spray guns. These operations take place on prepared surfaces of vessels within the dry dock, in a paint booth, and within the interior of vessels. When painting operations take place within the dry dock, containment curtains are installed on the ends of the dry dock.

Wastes generated during these activities include solvents, painted debris, paint sludge, paint cans, and paint solids. Materials used and subsequent wastes generated will vary depending on the size and scope of each job.

### **Tank Cleaning**

Tank cleaning operations remove dirt and sludge from internal bilge, ballast, and fuel tanks. Hot water is used for this purpose. Tank cleaning can generate significant amounts of wastewater contaminated with oil, grease, sludge, fuel, and metals. Wastewater generated from these activities is pumped to storage tanks for treatment or recycling.

### **Mechanical Repairs**

Vigor Alaska does not perform vehicle maintenance operations such as changing oil, transmissions fluids, spark plugs, air filters, fuel filters, tires, radiator fluids, and vehicle washing. All vehicle maintenance and cleaning is performed by a separate company outside of the facility.

### **Hydraulic Repairs**

Hydraulic repair has the potential to generate waste oil and oily contaminated debris. These operations can utilize significant amounts of new oil and lubricant products. The amount of waste generated and materials used are dependent upon each particular job.

### **Pipe Fitting**

Pipefitting involves pickling brazing, and welding operations. Wastes generated during these activities include spent cutting oil and non-destructive testing material.

### **Waste Liquids from Tanks**

Ship tanks are often emptied and cleaned upon arrival at Vigor Alaska. Waste materials from these



operations include bilge liquids, ballast water, fuel, and sanitary wastes. Off loaded fuel and oil are recycled and the tank water wastes are directed to the Publicly Owned Treatment Works (POTW). The remaining tank wastes and oily water is treated through an oil water separator followed by an activated charcoal polish prior to discharge to the POTW or to the permitted NPDES discharge system.

The batch water discharged to the POTW is normally laboratory tested prior to discharge. The amounts of these wastes will vary depending upon the size of the tank and scope of the job.

### **Fueling Operations**

Fueling of facility vehicles and vessels can take place prior to ships departure from Vigor Alaska. These operations are generally conducted from pier-side delivery trucks. The amounts of fuel taken on by the vessel are variable and dependent on the size and needs of each ship.

### **Boiler Cleaning**

Boiler cleaning may involve the use of solvent and caustic cleaners, and subsequently can produce solvent and caustic wastes. The Vigor Alaska boiler does not have anticorrosive additives. Boiler wastes and boiler blow down are contained, tested, and discharged to the POTW.

### **Hazardous Wastes Storage**

Hazardous waste generated at Vigor Alaska is stored in the designated hazardous waste building for a maximum of 180 days. The amounts of hazardous waste stored vary depending upon the amount of industrial activity taking place. Satellite accumulation areas may exist on the pier, machine shop, and dry dock when ships are being serviced. Typical wastes accumulated include paint debris, paint sludge, waste blast grit, and petroleum wastes. The amounts of wastes generated vary with each job.

### **Waste Segregation, Reclamation, and Recycling**

Waste reclamation, recycling, and segregation activities are conducted at the hazardous waste storage area, oil storage area, and dry dock facility. The amounts of wastes processed in these areas are directly proportional to the amount of work conducted at Vigor Alaska. The used oil may be used for space heating. The used paint cans will be emptied and the waste liquids removed to proper storage and handling. Waste solvents are recycled in a solvent still. Still bottoms are removed from the recycling system and placed into proper hazardous waste storage containers. Waste grit is laboratory tested and disposed in a landfill or other appropriate waste management systems. Waste lead acid batteries are shipped locally to NAPA Automotive for recycling. Waste scrap metals such as lead sheet, aluminum, copper, zinc, and brass are shipped to Seattle, Washington for recycling. Used oil may also be shipped as a recyclable material to Emerald Services in the state of Washington for recycling.

## **Potential Pollutant Sources - Material Handling and Storage Areas**

The following Vigor Alaska material handling areas and storage areas have potential to create hazardous situations or hazardous spills:



- Shipping and Receiving area and warehouse located inside the west side of the Vigor Alaska specialty shops building.
- Abrasive blast grit storage located in the waste management, blast booth area, or on the dry dock deck.
- Roofed paint material handling areas located in the paint department storage lockers, paint storage inside the paint booth, and bulk liquid storage area (55-gallon drums of paint thinners or petroleum products) located beside the hazardous materials storage area.
- Fuel storage areas (inside double-contained steel storage containers) located on the pier, south area of the machine shop, and west shore side of the property.
- Covered hazardous materials handling area located on the south side of the property.
- Oils and lubricants are stored in the bulk liquid area, within vehicles, or inside the warehouse. Oils and lubricants are stored in their original containers until used or transferred to a secondary container for a specific job.
- Waste water and oil is stored in the oil storage/oil water separator area for sampling and treatment prior to discharge or transportation to recycling facility.

Chemical products are stored in their original containers until used or transferred to temporary containers for a specific job. Waste oils and oily water are stored in containers within secondary containment.

The only materials stored outside of roofed areas are the raw metals for the machine shop and the bulk liquid storage located next the OWS building. The bulk liquids consist of petroleum products inside original 55-gallon drums. The drums are stored in containment pallets with storm proof covers. The shipping/receiving/warehouse is protected inside the west section of the specialty shops building. An additional receiving/storage area of large items is located outside under a roofed structure west of the specialty shops.

### **Potential Pollutant Sources - Activities Creating Dust and Particulates**

Outdoor abrasive blasting operations are conducted on ships in the floating dry docks and on ships berthed beside the Vigor Alaska facility. Particulate emissions are contained by tarps, dust curtains, or other appropriate means. Copper slag is the primary abrasive used. Spent materials may contain traces of metals such as copper, zinc, lead, and nickel.

Outdoor painting operations are conducted in the floating dry docks and on ships berthed pier side. The interior areas of vessels may be painted while pier side. The exterior areas of berthed vessels may also be painted with rollers while maintaining proper containment. Steel plate construction, burning, welding, and cutting operations are conducted outdoors while constructing or repairing marine vessels.

### **Significant Spills and Leaks**

Vigor Alaska has not had a significant oil or chemical spill from the facility to the surrounding navigable waters in the past three years. Every Vigor Alaska spill to the dry dock deck or facility has been completely cleaned up and removed, and all spills of oil to the Tongass Narrows water were followed up with a successful and complete cleanup operation. The Spill history is listed in Appendix B.



## Non Storm Water Discharges

Non storm water from dry docking Vigor Alaska docking includes:

- Ballast water from dry docked vessels
- Non contact cooling water from dry docked vessels
- Flooding water from dry docking operations
- Hydro washing (high pressure wash) water
- Bilge water from vessels at dry dock
- Potable water
- Fire suppression system
- Boiler condensate

These non-storm water sources from Vigor Alaska dry docking operations are minimized whenever possible. Flooding water, hydro washing water, ballast water, boiler condensation, and bilge water from the dry dock are covered under the Vigor Alaska individual NPDES Permit Number AK-004567-5. Oily wastewater and bilge water are sent to the sewer system after treatment with an on-site oil water separator and a granular activated carbon polish. Boiler blow down liquid from the pier boilers is stored in dedicated containers and transferred to the sanitary sewer system.

Storm water that contacts wastewater from shipbuilding or ship repair activities will be separately collected and managed under the individual NPDES discharge permit for the dry docks and ship repair pad. Storm water entering the Vigor Alaska property from neighboring industrial activities will be monitored.

Allowable non-storm water (other than NPDES permitted discharges) from the Vigor Alaska yard activities include:

- Potable water sources
- Landscape watering
- Pavement wash waters where spills or leaks have not occurred
- Building wash down water (without detergents)
- Air conditioning condensate
- Air compressor condensate
- Foundation drains
- Fire suppression system water
- Fire hydrant flushes
- Boiler condensate
- Non-contact cooling water

The non-storm water discharges are not allowed to contact hazardous materials or hazardous storage areas. The yard storm drains have been re-numbered to assist documenting storm water inspections (Appendix A, Drawing Two). The Vigor Alaska yard layout and activities have been reviewed to determine ongoing non-storm water discharges and potential for non-storm water discharges. At present there are no non-storm water discharges and no potential for non-storm water discharges except as noted in the following dry





weather storm drain (SD) assessment conducted on June 2, 2009:

- SD-1 No non-storm water discharges. Potential for pavement and building wash down water. An oil water separator is housed inside a roofed shed. Two oil storage tanks are housed inside containment. Vehicle parking is located next to the supervisor's trailer and is under consistent surveillance. Steel parts are stored close to this area at the machine shop. Zinc metal parts are stored inside covered areas. The drain is fitted with sediment drain fabric with an oil sorbent pad.
- SD-2 Same as SD-1
- SD-3 Same as SD-1
- SD-4 Same as SD-1
- SD-5 Same as SD-1
- SD-6 Same as SD-1
- SD-7 No non-storm water discharges. Paint is stored nearby inside a roofed storage box. Paint mixing occurs inside the storage box or inside containment pans. No vehicle parking in this area.
- SD-8 Same as SD-7
- SD-9 No non-storm water discharges. Hazardous wastes are stored inside a nearby roofed structure. The waste storage building has a containment system.
- SD-10 Same as SD-9
- SD-11 Same as SD-9
- SD-12 Same as SD-9
- SD-13 No non-storm water discharges. Painting occurs inside roofed paint booth. Sandblasting occurs inside roofed blast booth. A 2500 cfm ventilation system with a filter tank will be used at the painting and blasting booth. Air compressor condensate is captured next to the compressor system and inspected for oil.
- SD-14 Same as SD-13
- SD-15 Same as SD-13
- SD-16 No non-storm water discharges. This drain is located outside of the leased property boundary and contains a subsurface oil water separator prior to outfall number two.
- SD-17 No non-storm water discharges. This drain is located in the metal laydown staging lot. This drain leads to Outfall 3.
- SD-18 Same as SD-17
- SD-19 Same as SD-17
- SD-20 Same as SD-17
- SD-21 Same as SD-17
- SD-22 Same as SD-17.
- SD-23 Same as SD-17
- SD-24 Same as SD-17
- SD-25 New Parking lot. No non-storm water discharges. Drains to ditch (Outfall PL). This outfall is usually non-flowing due to infiltration.
- SD-26 Same as SD-25
- SD-27 Shipbuilding area and metal laydown lot. This area is predominantly used for small shipbuilding activities or temporary storage of steel parts. No non-storm water discharges. This drain leads to a new outfall (Outfall 4) located at the southeast edge of the property. Outfall 4 is substantially identical to Outfall 3.
- SD-28 Same as SD-27. No non-storm water discharges.
- SD-29 Same as SD-27. No non-storm water discharges. This area is for shipbuilding and storage of



steel parts.

- SD-30 Same as SD-27.
- SD-31 Same as SD-27.
- Drydock-1 Waste water was described in previous sections. Discharge coming from potable water hose being used for interior wing wall work. Fire suppression water (potable water) discharges for cold water protection. Impacted storm water will be collected for treatment in the NPDES discharge permit.
- Drydock-2 Installed in 2009. No non-storm water discharges. . Impacted storm water will be collected for treatment in the NPDES discharge permit.
- Upland Repair Pad Installed in 2008. Discharge of potable water from leaking hose. Storm water discharges are new to Outfall-1
- Pier Small discharges of potable water from main pier boiler feed and from pier fire response lines. These lines drain periodically to keep system pressure nominal and to eliminate rust in lines.

## Soil Erosion and Soil Impact

Approximately 90% of the Vigor Alaska property has improvements with impervious paved surfaces consisting of concrete or asphalt. Additionally, about 20 % of the property is covered with roofs. The potential for soil erosion is very low; drainage in the Vigor Alaska yard is adequate. A vegetative berm exists around the entire northwest and southern industrial edges with the exception of the pier side and the edges of the upland repair pad. The industrial area with potential for a threat of pollution, relative to the ground surface under which the activity occurs, is the painting booth, sandblasting booth, and upland repair pad. The painting and blasting activities occur under containment or inside a roofed building containment. No paint is stored outside in this area. Fresh sandblast grit is temporarily stored outside in this area. The fresh blast grit is contained inside storage bags.

## Risk Assessment of Potential Pollutant Sources

Vigor Alaska has the following industrial use areas. Some of these areas are potential sources of pollutants:

- Two Dry docks
- Upland repair pad
- Pier
- Machine shop
- Waste oil storage area
- Hazardous waste handling/storage area
- Sand blasting building
- Painting building
- Shipbuilding area and fabrication hall
- Facility admin and parking area
- Paint storage area
- Roofed loading, storage, receiving area

The administrative area and parking area are not areas of potential sources of hazardous pollutants. Each area of risk will be discussed along with the related spill prevention measures and significant materials



handled. The potential of storm water exposure or non-authorized storm water discharges and associated pollutants are also discussed in this section. Table three, Vigor Alaska Activity and Area Summary, summarizes these details.

**Table Three – Vigor Alaska Activity and Area Summary**

Activity	Area								
	Pier	Dry docks	Mach Shop & Receiving	Oil & Haz Waste Storage	Ship Building or Repair Pad	Blast & Paint Booth Area	ASD Vehicle Parking Area	Paint Storage	Admin. Parking
Surface Prep.	X	X				X			
Painting	X	X			X	X			
Tank Cleaning	X	X							
Pipe Fitting	X	X	X		X				
Hydraulic Repair		X	X						
Mech. Repair	X	X	X				X		
Haz Waste Storage		X		X		X			
Fabrication	X	X	X		X				
Haz Mat Storage		X	X	X		X		X	
Waste Materials	Pier	Dry docks	Mach Shop & Receiving	Oil & Haz Waste Storage	Ship Building or Repair Pad	Blast & Paint Booth Area	ASD Vehicle Parking Area	Paint Storage	Admin. Parking
Fuels	X	X	X	X			X		X
Spent Grit		X		X		X			
Paint		X		X	X	X		X	
Oil	X	X	X	X			X		X
Solvents		X	X	X		X		X	
Sewage Hookups	X	X		X					
Heavy Metals		X		X		X			
Dust		X		X					
Oily Water		X		X					
Hydro Wash Water		X		X					
Ethylene Glycol		X		X			X		X
Misc. Liquid Wastes		X		X					

**Table Four  
Vigor Alaska Activity and Pollutant Risks**

Pollutant Source	Activity									
	Surface Prep.	Painting	Tank Cleaning	Pipe Fitting	Hydraulic Repair	Mech. Repair	Haz Waste Storage	Fabrication	Haz Mat Storage	Fueling & Vehicle Maint.
Spills and Leaks		X					X			
Storm water	X	X								
Spent Grit	X									
Parts Cleaning			X	X	X	X				
Process Water	X		X							
Waste Disposal	X									
BiIge & ballast Water			X	X			X			
Hydro wash Water	X									
Dry dock Flood Water	X	X								
Paint Overspray		X								



Refuse & Garbage	X						X	X		
Oily Debris			X	X	X	X	X			X
Haz Mat		X							X	X
Materials Mixing		X					X			

### Dry dock

The dry docks are covered under the Vigor Alaska NPDES Permit Number AK-004567-5. The permit was recently renewed in 2012 under Alaska State primacy. The BMPs applicable to the dry dock use and NPDES permit conditions are included in the Vigor Alaska BMP manual. Dry dock floodwater is regularly monitored and laboratory analyzed for compliance. Storm water exposure can occur during unprotected ship repair operations. Storm water exposure is eliminated or minimized with shrouding, covered storage of materials, mixing paint prior to use on the dry dock deck, cleaning up spills immediately, good housekeeping practices, and monitoring sumps for general refuse or spills. Oil wastes are removed from the dry dock for storage and recycling. Oily water is removed, stored in proper containers, treated, and discharged under the NPDES permit or Vigor Alaska POTW discharge permit. Wind curtains and shrouding are utilized to manage fugitive sand blast grit and paint overspray.

### Pier

The Vigor Alaska pier is used for mooring ships undergoing repair and maintenance activities. The types of activities conducted on the pier require short term storage of materials during delivery to or from the vessel. A gantry crane is utilized to take material from the pier to a moored or dry-docked vessel. Some long-term material storage to support industrial activity also takes place. A 2,000 gallon diesel fuel tank is used on the pier to support a boiler system. The fuel tank has a covered double walled containment. Vehicles also travel on the pier for fueling vessels moored to the pier. These fueling operations follow the US Coast Guard regulations for transferring oils or fuels from shore to ship over the navigable waters. Electrical generators are periodically used on the pier, which require the short term use of gasoline or diesel fuel storage tanks.

The pier shall be regularly inspected to ensure that there is no threat to the receiving water in case of a storm event. Preventive measures include isolation of specific hazards such as abrasive blast equipment, hazardous wastes, and hazardous materials storage.

### Waste Storage Areas

Hazardous waste is stored in the designated hazardous waste storage building at the south area of the property. Hazardous waste is stored for no longer than 180 days. The volume of hazardous wastes stored at Vigor Alaska varies depending upon the amount of industrial activity taking place. Satellite accumulation areas also exist on the dry dock, and painting/blasting booth, when ships are being repaired. Typical wastes accumulated in these areas include spent sandblast grit and waste paint. Used oil and used fuel may also be accumulated on the dry dock. Waste solvent satellite storage is kept in the machine shop at the parts cleaning bin. The machine shop and blast booth are covered buildings and will not have wastes that are exposed to storm water.

Non hazardous wastes are also stored at this area. Used oil is stored in tanks inside a containment area





prior to shipping to Emerald Services in Seattle, Washington for recycling. The used oil may also be recycled for space heating. Oily debris is contained inside bags and stored within the covered waste storage building. After removal from the dry dock, waste sandblast grit is stored in containers until recycled or disposed at a local landfill. The grit is laboratory tested to ensure that the material is non-hazardous. Oily water is stored in tanks until ready for treatment and discharge. The water is filtered through an oil water separator system and further treated through a granular activated carbon system prior to discharge. The quantities of non hazardous wastes produced depend upon the shipyard activities taking place. Preventive measures include keeping wastes under a roofed area, utilizing secondary containment for tanks, and keeping debris bagged to prevent spilled liquids and wind blown or rain eroded materials

### **Paint Storage Area, Oil Product Storage Area, and Receiving Area**

New liquid products received at Vigor Alaska usually come in five-gallon or 55-gallon containers. Paint and solvent liquid materials are stored in the paint storage area. The paint is stored in original five-gallon containers and the containers are stored inside roofed Conex boxes. Storm water exposure is not allowed to occur. The paint mixing is done inside containment pans and is usually done inside the conex box containment or under cover on the dry dock deck. New oil product also comes in five-gallon or 55-gallon drums. Oil products are stored under a roofed area next to the paint storage area or inside covered containment pallets. Drums of liquid materials may be temporarily stored under cover at the roofed receiving area next to the machine shop.

### **Admin Offices and Parking Area**

The administrative offices and parking space area is not used for storing or handling Vigor Alaska shipyard materials or wastes. The parking lot consists of pavement or unimproved gravel. There exists a slight potential for oil and gasoline exposure to storm water from employee vehicles in the parking lot area. The administrative area consists of roofed buildings or office trailers.

Vigor Alaska vehicle parking is designated to the paved side of the administration offices and in front of the supervisor's trailer. The exposure to storm water from these areas is minor. Containment is available to confine drips from leaking engines or emergency vehicle maintenance materials spilled to the surface. Vigor Alaska does not wash or steam clean their fleet vehicles. Many of the vehicles and equipment used at Vigor Alaska is rented or leased. All of the rented units and fleet vehicles are maintained outside of the Vigor Alaska facility.

### **Machine Shop Area**

The machine shop is used for small and intermediate sized manufacturing, metal working, welding, cutting, etc. No storm water exposure to waste products or stored materials occurs. All work and materials are located inside the covered machine shop building except for plate steel, steel pipes, aluminum materials, and copper materials which are stored outside at the east side of the building

Shipping and receiving is located inside the machine shop. This area is covered and not storm water exposed. A roofed area for large articles received by Vigor Alaska is set up next to the machine shop. This storage is for new contained articles and does not have storm water exposure.



### **Sandblasting and Painting Booth Area**

Sandblasting and painting not conducted inside ships or on the dry dock is conducted in the sandblasting or painting booths. These booth activities are located inside one enclosed building and therefore are not exposed to storm water. Materials being moved in and out of the structure are managed closely to eliminate spills of new materials or spent wastes. Equipment is inspected to be free of blasting grit prior to removal from the building.

This facility is located near the south edge of the property. Waste grit and waste paint are temporarily stored inside the building after painting and blasting activities. New paint may be stored inside the structure in small quantities of one gallon and five gallon cans. New sandblast grit is stored inside blast canisters or inside super sack containment bags.

### **Ship Construction Area and Fabrication Hall**

The ship building area is located at the north side of the facility. This operation includes steel work, cutting, welding, and steel fabrication. Final painting may occur before a ship is moved from land to the water along a rail system. Shrouding, tarps, booths, and wind curtains will be used to manage paint overspray.

### **Oil Storage and Asbestos Decontamination Area**

The used oil storage area is located at the south side of the facility next to the hazardous waste storage building. Used oil and oily water are stored in this area inside 5,000 gallon and 9,500 gallon tanks. The tanks are situated inside a containment berm. A portable transfer container is used to transfer used oil to the tanks. A containment berm is located next to the tank berm for parking the portable container. The containment is inspected weekly for leaks and spills. The storage and inspection routine make storm water impacts unlikely. The used oil is recycled. The oily water is treated through an oil water separator (OWS) and activated carbon system prior to discharge.

An enclosed work trailer is located next to the oil storage area. This trailer is completely enclosed and used for post-remediation decontamination. Waste materials and protective equipment from remediation and decontamination activities are bagged, labeled, and stored in the waste storage system. There is no storm water exposure from this operation.

Asbestos from remediation jobs is bagged, labeled, and stored inside the hazardous waste storage building. The double bagged asbestos material is stored inside the container until ready for shipment to an approved disposal facility. There is no exposure potential to the stored asbestos.

### **Summary of Pollutant Risk**

Vigor Alaska conducts ship repair and maintenance operations including painting, abrasive blasting, sheet metal fabrication, pipe fitting, tank cleaning, welding, machining, and carpentry work.

On-shore facilities include a metal working shop, hazardous materials storage facility, oil handling and oil water separator facility, decontamination trailer, paint booth, and sand blasting booth. These onshore activities are not exposed to storm water or are contained within berms and containment systems.

General garbage is accumulated in covered roll off bins, which are collected and periodically taken to the



local landfill. Typical wastes handled in the hazardous waste storage facility are waste paints, waste solvents, spent paint cans, oily debris, waste oil, spent activated carbon, and universal wastes. These wastes are accumulated in covered containers and within roofed areas and are not exposed to storm water. A slight exposure risk occurs when transporting the material to the storage area.

One pier and an upland repair pad are used to support vessels that are undergoing maintenance and repair operations. Typical wastes staged or transported to these sites are spent abrasive, paint, petroleum products, sanitary wastes, and general garbage.

Two dry docks will be in use at Vigor Alaska. The dry docks have oil and sediment separation sumps to contain bulk materials, debris, and contaminants. Each corner of the dry dock has containment berms to collect fugitive debris and spilled contaminants. Typical wastes generated during dry dock activities include spent abrasives, paint, rust, oils, fuels, marine growth, and general refuse.

### **Storm water Best Management Practices**

A full description of the Vigor Alaska BMPs is available in the Vigor Alaska Best Management Practices Plan for Shipyard Manufacturing and Repair. Table Five summarizes the BMPs as related to major Vigor Alaska activities. The BMP titles are numbered and listed in the Vigor Alaska BMP document. To conserve space, the BMP numbering system is used in the following table.

Site control measures include:

- Fabric inserts in all storm drains to reduce sediment discharges and trap sheen storm water
- Vegetative berm along the property edges and parking lot to trap sediments and allow storm water infiltration.
- Oil water separator systems installed in-line near the discharge points from the industrial side of the facility (outfalls SW-1, SW2, and SW-4).
- Spill kits located at industrial operations such as the dry docks, loading dock, oil management area, and hazardous materials storage areas.
- Spill response materials staged in container box located at central location
- Spill response boom located for immediate access.
- Storm water drain covers for emergency response to upland spills.
- Storm water drain plugs for emergency containment of spills entering drain sumps.
- Hazardous materials storage building with full containment and safety features for storage of oil materials and hazardous wastes.



**Table Five - Best Management Practices**

Materials And Activities	BMPs																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Surface Prep.									X											
Transporting														X						
Mixing		X																		
Haz Waste Storage			X	X	X	X				X										
Used Oil													X							
Oily Debris													X							
General Refuse	X																		X	
Paint Overspray																				X
Waste Water											X									
Hydro washing																				
Oily Water																				
Bilge/Ballast																				
Parts Cleaning								X												
Abrasives																X				X
Spills	X		X													X		X		
Compatibility				X			X													
Containers/Labels					X	X	X		X	X										
Oil Water Separator											X									
Discharges											X	X						X	X	
Batteries															X					
Condensate																	X			
Dry dock																		X	X	X
Painting																				



**Table Five - Best Management Practices (continued)**

Materials And Activities	BMPs																
	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37
Surface Prep.										X	X				X		
Transporting															X		
Mixing		X								X	X		X		X		
Haz Waste Storage		X													X		
Used Oil								X				X		X			
Oily Debris														X			
General Refuse	X						X										
Paint Overspray										X	X						
Waste Water				X	X			X	X								
Hydro blasting			X						X								
Oily Water					X			X									
Bilge/Ballast					X												
Parts Cleaning																	
Abrasives	X						X				X						
Spills		X			X			X		X	X	X	X	X	X		
Compatibility																	
Containers/Labels	X														X		
Oil Water Separator														X			
Discharges							X										
Batteries																	
Condensate																	
Dry dock	X	X	X	X	X	X	X	X	X	X				X	X		
Painting		X								X	X		X		X		
Marine Fouling						X											
Subcontractor									X								
Vehicles										X		X					
Pier											X		X	X			
Fuels											X	X					
Inspections										X						X	
Record Keeping										X						X	
Training																	X

### Training and Drills

Vigor Alaska conducts a health and safety training course several times per month. Additional environmental meetings are held periodically when deemed prudent and necessary. Spill response drills are held at least twice per year. A tabletop response exercise is held annually. Spill notification drills are held quarterly. Persons in Charge (PIC) training is conducted annually for personnel involved in transfers of oils and fuels across the Tongass Narrows waters.

Personnel handling hazardous waste or responding to spills are HAZWOPER trained (OSHA 1910.120). Eight-hour HAZWOPER refresher training is conducted annually. Paint department personnel have had paint management training. Additional training includes eight hour supervisor training (OSHA 1910.120), confined



space entry, OSHA 29 CFR 172 subpart H, DOT/HM-126F hazmat training, and asbestos abatement training.

Training is also conducted annually for BMPs, hazardous waste management, SPCC requirements, US Coast Guard environmental regulations, Vigor Alaska Facility Emergency Response and Oil Operations Plan, and storm water management. Storm water training includes:

- Good housekeeping
- Material management
- Containment and control measures
- Spill response
- Loading materials
- Transporting materials
- Permit monitoring and inspections
- Reporting

### **Annual Comprehensive Site Compliance Evaluation**

The Vigor Alaska Environmental Department will conduct one storm water comprehensive site compliance evaluation during each annual monitoring period. All evaluations shall be conducted within eight to 16 months of each other. The annual comprehensive report must be submitted to the Alaska DEC within 45 days of completion. The annual report will include the inspection results and a summary of corrective actions. The SWPPP shall be revised as appropriate within 90 days of the evaluation. Evaluations shall include:

- Review and evaluation of all BMPs to determine which BMPs are adequate and properly maintained.
- Review of BMPs or industrial activities which need to be changed or eliminated.
- Inspection of leaks or spills from equipment or containers.
- Tracking or blowing of waste materials into exposed areas.
- Inspection of all potential pollutant sources such as trash, industrial materials, or residue for evidence or potential for pollutants to enter the storm water drainage system.
- Review of all observations records, inspection records, sampling, and analytical results.
- An evaluation report and dates of the evaluation.
- Personnel performing the evaluation.
- Necessary SWPPP revisions and schedule of SWPPP revisions.
- Incidents of non-compliance and incidents of corrective actions taken.
- Self-certification that Vigor Alaska is in compliance with the General Permit.

The site compliance evaluation shall be recorded as part of the annual report and retained for at least five years. The report will be signed and certified in accordance with the General Permit.



## SWPPP Revisions

Vigor Alaska shall retain the SWPPP on site and will make the document available upon request of a representative of the EPA or ADEC. This agency may notify the Vigor Alaska Environmental Department when the SWPPP does not meet the minimum requirements. When requested, Vigor Alaska will submit revisions and implementation schedules that meet the requirements to the requesting agency. After implementing the required revisions, the Vigor Alaska Environmental Department shall provide written documentation to the requesting agency that the revisions have been implemented. The revisions will be kept in Appendix C. The SWPPP will be revised prior to changes in industrial activities which may:

- Significantly increase the quantities of pollutants in storm water discharge.
- Cause new areas of industrial activity at the facility to be exposed to storm water.
- Begin an activity which would introduce a new pollutant source at the facility.

The SWPPP shall be revised and implemented in a timely manner and no more than 90 days after the Vigor Alaska Environmental Department determines that the SWPPP is in conflict with any requirements of the General Permit. Vigor Alaska will provide written notification to the ADEC after the revisions are implemented.

If any part of this SWPPP is not feasible to implement in a timely manner due to proposed structural changes, operating procedures, or unforeseen incidents, a report will be submitted to the ADEC describing:

- Sections of the SWPPP that is not feasible to implement.
- Justification for time extensions.
- Schedule for completing and implementing that portion of the SWPPP.
- Interim BMPs to be implemented to reduce and prevent storm water impacts.

## Runoff Management and Control Measures

An oil water separator and sediment trap have been installed at outfall number SW1, SW2 and SW3. Storm drain fabric is added to all of the site storm drains. Outfall number SW2 drains the blasting and painting booth area, south and east machine shop area, paint storage area, and hazardous waste storage area. Outfall number SW1 receives storm water drainage from the upland ship repair pad. Outfall number SW3 drains the north machine shop, vehicle parking area, fabrication hall, and administration area.

These drains have been equipped with sorbent pads to trap any oil sheen that may migrate from minor accidents at the storage areas or vehicle parking area. The drain traps and fabric will collect any trash, debris, sediment, and oily materials picked up by storm water. The sediment traps in the storm drains will be periodically cleaned of debris as noted on the maintenance section of the quarterly monitoring form (Appendix D). Problem areas around storm drains will be periodically swept clean of trash, dirt, and debris.

Structural and non-structural Best Management Practices for the Vigor Alaska facility are described in the Vigor Alaska's BMP document, which is printed separately from the SWPPP.





Spill prevention and response are detailed in several Vigor Alaska contingency plans, the Vigor Alaska SPCC (Spill Prevention Control and Contingency Plan), and in the BMP document. Vigor Alaska conducts several emergency response drills annually. The contingency plans and BMPs will be maintained and enforced. Proper storage and handling of materials and wastes will be used to minimize and eliminate storm water contact with chemicals, debris, and non-storm water liquids. The Vigor Alaska facility is manned or monitored 24-hours per day for security and is usually under surveillance.

## Monitoring and Reporting

The monitoring and reporting that will be conducted under the Multi Sector General Permit (MSGP) is described in detail in the Vigor Alaska Storm water Monitoring Plan and in the attached MSGP Permit. Quarterly visual assessments, routine facility inspections, and annual (comprehensive annual review) inspections will be regularly conducted (appendix D and E). The SWMP is attached as Appendix F. Routine facility visual inspections will be recorded per MSGP Sector R requirements. The new monitoring schedule under the 2015 MSGP began on April 1, 2015. The sample results, inspection results, and corrective actions will be reported to the Alaska Department of Environmental Conservation (DEC). Annual inspections will be conducted by the Vigor Industrial Stormwater Manager (or a chosen delegate) once during each of the periods under the following schedule:

Year 1	April 1, 2015 – March 31, 2016
Year 2	April 1, 2016 – March 31, 2017
Year 3	April 1, 2017 – March 31, 2018
Year 4	April 1, 2018 – March 31, 2019
Year 5	April 1, 2019 – March 31, 2020

The current storm water discharge general permit expires on March 31, 2020. Vigor Alaska will submit another Notice of Intent (NOI) to the ADEC on October 3, 2019 180 days prior to the end of the permit.

## Review of Rare and Endangered Species and Critical Habitat

Appendix G includes the Alaska Natural Heritage Program (NHP) listings and rankings of rare plants known from the Ketchikan B6 USGS quadrangle and rare animals from the Ketchikan 1:250000 quadrangles. The NHP stated that there are no rare species occurrences known in the specific facility area. One endangered plant species is listed for Alaska but this species occurs only at Adak Island.

Also included in Appendix G is the Alaska county/species list of federally listed endangered and threatened species and the US Fish and Wildlife Service (USFWS) threatened and endangered species system (TESS) list for Alaska. Twelve endangered animal species are listed for Alaska. Of these listed animals, only the short-tailed albatross, humpback whale, and stellar sea lion occur occasionally in Southeast Alaska. . The USFWS stated that Humpback Whales and Stellar Seals do occasionally travel through the Tongass Narrows.

Although two species of interest are believed to occasionally move through the Tongass Narrows, these species are not listed for this specific area and are not known to stay in the proximity of the Vigor Alaska facility. Furthermore, these species do not have ready access to the areas around the Vigor Alaska outfalls.





No endangered species or threatened species are listed as occurring in the Tongass Narrows. There were verbal communications with the USFWS that Stellar Sea lions and Humpback Whales occasionally pass through the Tongass Narrows. The Tongass Narrows has heavy traffic in seaplanes, recreational boating, fishing, and passenger liners. These species are not sighted within the confines of the Vigor Alaska ship yard operating area which is located between the heavily used Alaska Marine Highway System (AMHS) dock and heavily used Alaska Airlines airport ferry. The Vigor Alaska storm water outfalls are located outside of the main Tongass Narrows, toward the shoreline within two jutting points of land where the Vigor Alaska property is located. Stellar Sea lion and Humpback Whale incursion into these tight areas with human use and heavy sea traffic is essentially nonexistent. It has been determined that Humpback Whale and Stellar Sea lions, if they occasionally go through the Tongass Narrows, are not in proximity to the facility storm water discharge locations. A visual inspection of the Vigor Alaska storm water outfalls showed no presence of whales or sea lions. The National Marine Fisheries Service (NMFS) stated that there is no critical habitat located in Tongass Narrows.

Based upon the investigation, as covered under Part 1.2.3.6 of the MSGP permit (included in Appendix H), Vigor Alaska assigns Criteria A, no endangered or threatened species or critical habitat are in proximity to the facility points where authorized discharges reach the receiving water.

### **Historic Properties Preservation**

The storm water and allowable non-storm water from the Vigor Alaska property does not have the potential to affect historic properties. The original site was the McKay Marine Ways, built for small boat repairs and halibut fleet. The original buildings and structures are gone and the current shipyard is located on fill material. The current shipyard is bordered by industrial sites that have no historic properties.

### **SWPPP Certification**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision.

I certify under penalty of law that this document and all attachments were prepared under my direction of supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

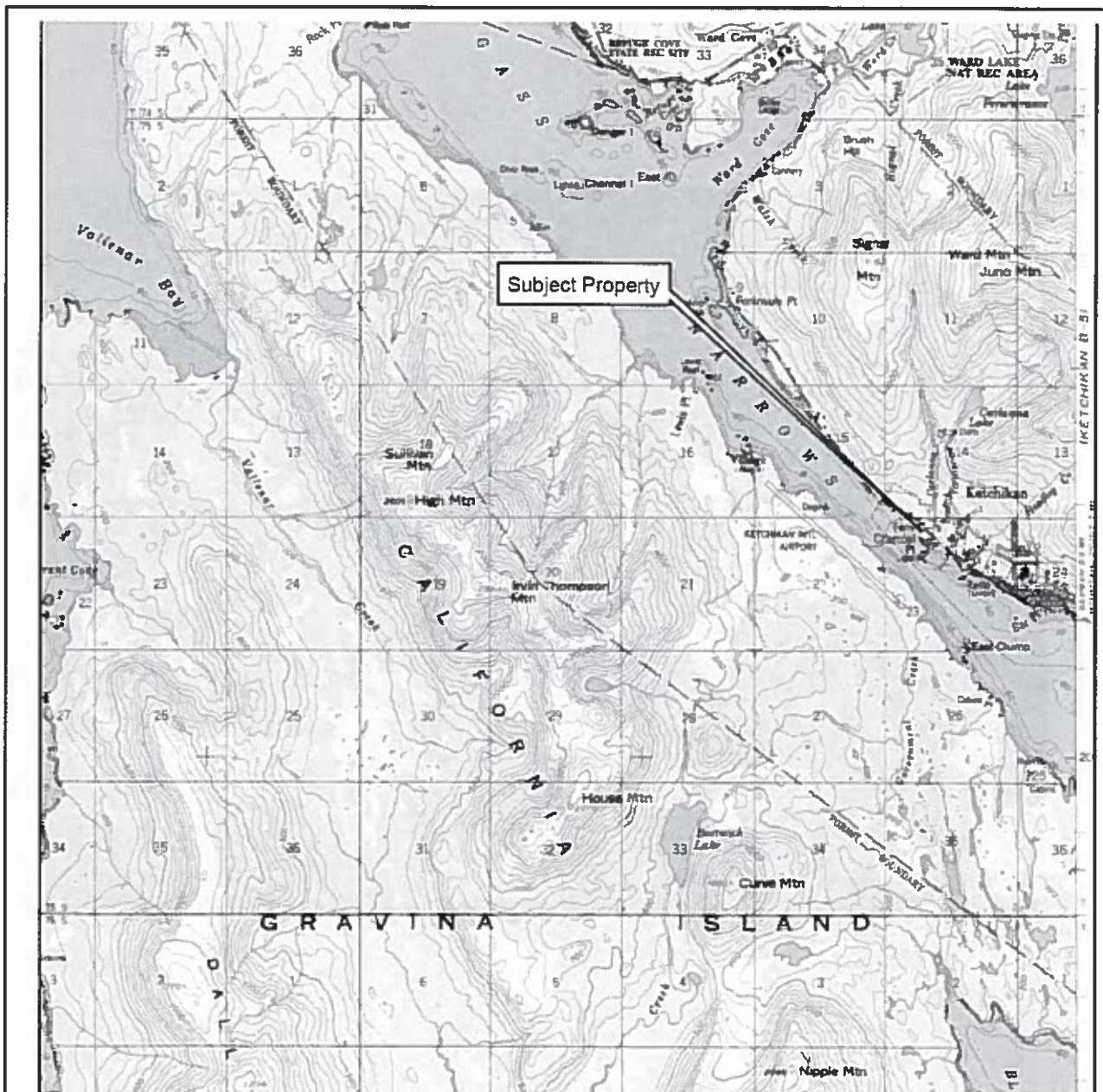
Signature:

Date: September 28, 2015

Tammie L. Wilson  
Stormwater Manager Vigor LLC



## **APPENDIX A, Site Maps**

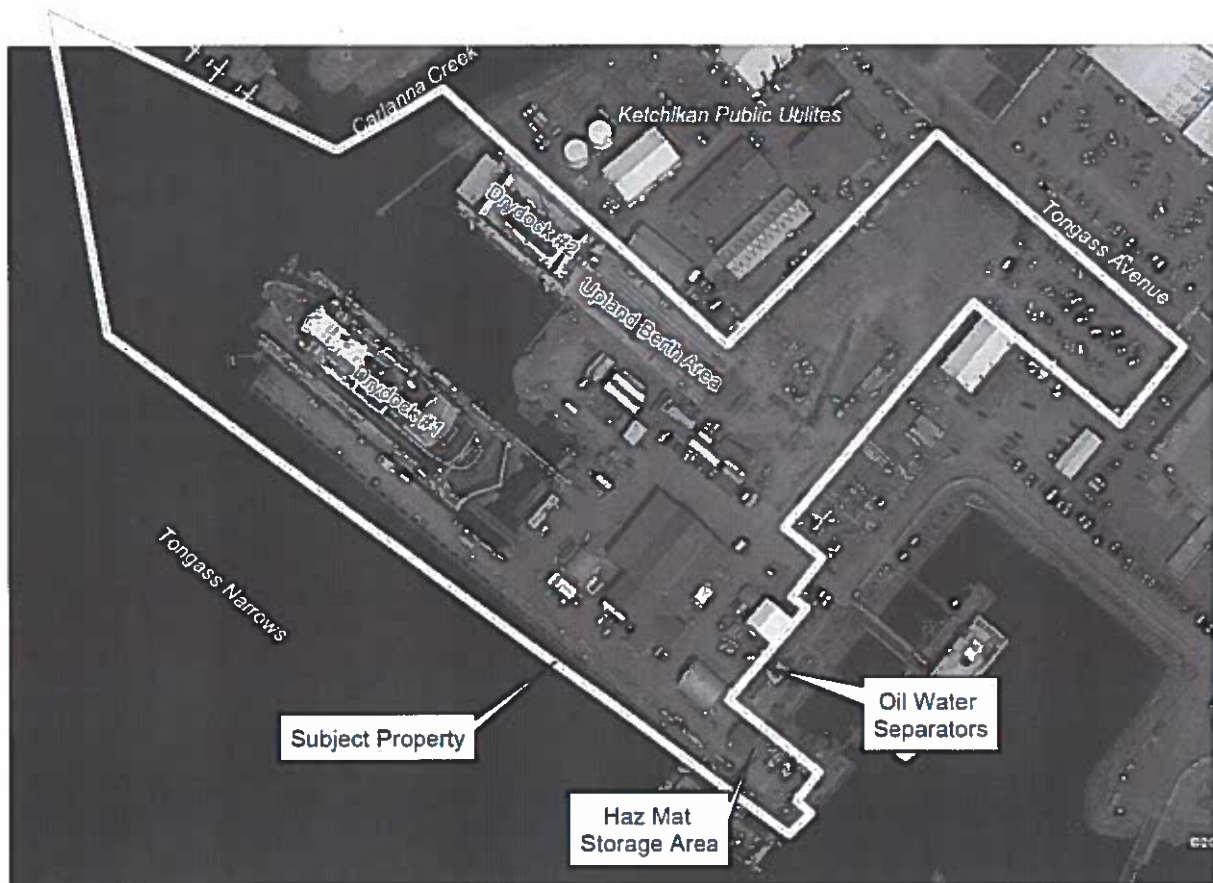


**Figure 1**

Site Location Map  
Icebreaker Property  
3801 Tongass Avenue  
Ketchikan, Alaska

Date:	Drawn By:	Checked By:	Project No.:
01/16/12	BC	ECI	0152473





**Figure 2**  
**Site Map**  
**Icebreaker Property**  
**3801 Tongass Avenue**  
**Ketchikan, Alaska**

Aerial Photograph; 2010

Date	Drawn By:	Checked By:	Project No:
01/16/12	BC	ECI	0152473









## **APPENDIX B**

### **History of Site Spills**



ASD INCIDENT RECORD			
Date	Site	Cause	Response and Follow Up
1-17-06	ASD-SD#1 Reported	Hydraulic Oil	Reported. USCG #785464. Man lift hose failure, one quart of hydraulic oil spilled near storm drain. Spill was immediately boomed and collected.
3-22-06	KPU storm drain next to ASD	Unknown. ASD not at fault	Oil sheen coming from neighboring storm drain. Reported to Mr. Manbeck of the USCG. ASD not at fault
3-23-06	Rear of AMHS vessel Columbia	Leaking AMHS propeller shaft	Several drops of floating oil from stern of AMHS ferry vessel docked at ASD. Propeller shaft. Notified First mate/AMHS and USCG. Spill was boomed and area was monitored. Sorbents and collection operations commenced.
7-26-06	Dry dock	Creosote from pier logs	Contractor working on permitted wood pier on dry dock. Notified USCG (response#805570). No enforcement action. ASD not at fault
2-11-08	ASD Dry dock	Leaking hydraulic line	Five gallons of hydraulic oil spilled from a hose leak on snorkel lift #62163. No release to dock sumps or marine waters (Tongass Narrows). Oil was contained and completely cleaned up.
12-29-09	DD1 gantry Crane	Hydraulic oil spill from burst hose	Cleaned 30 x 90 ft sheen (NRC 927320). Source stopped and area cleaned up w/ pads and sorbent boom. Most loss was recovered.
11-3-10	Generator fuel tank overfilled	Susitna vessel diesel tank carelessly handled	Cleaned 15 x 90 ft sheen. Source stopped and area cleaned up w/ pads and sorbent boom. Loss was partially recovered. ADEC/USCG responded. PIC was retrained and PIC/DOI was revamped.
6-4-11	Keel cooler oil from burst keel (rocks)	Aleutian Ballard	Cleaned sheen from DD1 and Tongass Narrows (NRC 978671). Source stopped and area partially cleaned up w/ pads and sorbent boom. Loss was partially recovered. ADEC/USCG responded.
6-26-11	Oil & water from dry dock capture bucket overturned	Oral Freeman	Cleaned oil and sheen (NRC 965756, no citation). Source stopped and area cleaned up w/ pads and sorbent boom on dry dock deck. Most loss was recovered.
10-25-11	One Quart hydraulic oil	ASD forklift #44017 hose	Cleaned 12 x 3 ft sheen on pavement & waters (NRC 993573). Source stopped and area cleaned up w/ pads and sorbent boom. Most loss was recovered. ADEC/USCG responded. USCG citation.
10-26-11	Half quart mineral oil from pump	Drydock-1 sump	Cleaned 400 x 50 ft sheen on flood waters (NRC 993637). Source stopped and area cleaned up w/ pads and boom, boats, sorbent boom. Partial loss was recovered. USCG responded, no NOI.
8-8-12	Unknown hydraulic oil source from deck.	AK Victory vessel deck while dry docked	Vessel and dry dock impacted with oil. Heavy rain. Cleaned sheen and oil from waters and dry dock deck (NRC 102381, with NOI). Source stopped and area cleaned up w/ pads, boom, boats, and sorbent boom. Most loss was recovered.
2-17-12	Overfilled vessel fuel tank. One gallon diesel	MV Susitna	Lack of tank overfills plug and lack of PIC vigilance caused diesel fuel to spill onto vessel and nearby waters creating large sheen. Cleaned deck and water sheen with pads, sea boom, boats, and sorbents (NRC 1003304). Source stopped and area 80% cleaned up Pads and sorbent boom recovered. ADEC/USCG responded. USCG citation
3-21-2013	Vigor DD#1 and Pier 4 gallons on land 1quart into Tongass Strait	Hydraulic Leak from failed o-ring on lift	Fluid on land was cleaned up with sorbent pads. In water sheen which was about 9 square feet was contained with absorbent boom and cleaned up. US Coast Guard issued a Warning in Lieu of Civil Penalty.





## **APPENDIX C**

### **SWPPP Revisions**



## SWPPP REVISIONS

Date	Revision Details
Feb. 2003	P.4 Implementation and Objectives, P.5 Facility Plans P.10 & 17 Waste Storage and Waste Recycling, P.12 Non Storm water Discharges P.31 Spill Report on 10-11-02
March 2006	New BMPT members, new craft managers, New contingency plan dates
August 2007	Include sections describing new repair areas and new dry dock (drydock-2) P.3 Storm water Outfalls P. 4 Discharges – New discharge areas P.5 Table-1 and Facility Plans – Changes to plans and table P. 12/13 Non storm water discharges – New inspection areas P.14 Soil erosion, P.16 Dry dock, P. 17-19 Minor sentence changes P.23 Runoff Mgmt – New outfall information Appx. B – Spills Appx D – Quarterly inspection form Appx E – Monthly inspection form Site Map – Changes to site outfalls and area configuration
October 20, 2008	Fig.1 Site Map, AppB, AppC, AppF-H, Introduction, Stormwater Outfalls (p-1) Discharges (p-2), Volumes (p-7), Waste seg.(p-10), Potential Sources (p-11) Storm drain Tally (p-13), Soil Erosion(p-14), Oil Storage (tank size, p-19) Runoff Mgmt (drain numbers and upland pad, p-23) Rare and Endangered species (p-24)
May 19, 2009	Permit application timeline (p.4). Table-1, BMP team members. Waste Segregation (p.10). Table-2, Waste volumes. Endangered Alaska species review.
June 1, 2009	Changed storm water outfall numbers. Parking lot is now SW-PL. Changed SW5 to SW4. Changed SW6 to SW7. Added inspection schedule. Changed last paragraph of Storm water Outfalls (p.4). Revised site area footage (p.5). Significant Spills (p.11). Changed paragraph... Non Storm water Discharges (p.11)-changed wording and description of wastewater collection. Added new discharges inspection data from 2009. Annual Comprehensive (p.22). Added new inspection format for annual comprehensive inspections. Rare/Endangered Species (p.25). Added new information on rare species. Historic Properties (p.26). New paragraph. Updated signature statement, Updated storm water outfalls (p3), Updated bottom of p.10 and p.11 Added site control measures (p.20), Added bullets. P.23, Added fabric statement p.24.
Sept. 21, 2012	Changed storm water outfall numbers. Parking lot is now SW-PL. New drainage is now SW-City, Changed SW3- SW8 outfall numbers. Updated SWPPP Map. New pad and fabrication hall are in. New drains have been installed at east, west, and south of new fabrication hall. New pavement is in at fabrication hall and blast booth. Updated SWPPP with new information and new contacts. New Environmental Dept Director in October 2012.  Updated SWPPP and added ADEC to regulatory permit and contacts. Page 1- New facility name and new storm drains. Page 2 - New tracking number and new facility sites. Page 3 - Team members. Page 6 - Historical material handling. Page 7 - Discharge monitoring. Page 8 - Wastes. Page 10 - Allowable non storm water. Page 12 - Soil erosion. Page 13 -Table font and added ship fabrication hall. Page 15 – added 2012 permit information. Page 16 and 17 – Added fabrication hall, new facility locations, and miscellaneous details. Page 18 – Added SW4. Page 20 – Added BMPs 30 -37. Page 22 – Added ADEC to SWPPP Revisions. Added new storm water outfalls to Runoff Management. Page 23 – Added NOI submittal for 2013. Appendix A – Changed site map with new features and new storm drains. Appendix B – Added spill summary. Appendix C –Added new revisions. Appendix D – Changed monitoring form to reflect new site features and outfalls.



September 24, 2015	<p>Updated:</p> <ul style="list-style-type: none"><li>• Monitoring and Reporting Schedule.</li><li>• SWPPP Contacts.</li><li>• Pollution Prevention Team.</li><li>• Certification.</li></ul>
--------------------	--



**Appendix E**  
**Vigor Alaska**  
**Site BMP and Storm water Monitoring Form**



## Vigor Alaska BMP & Storm water Monitoring

Date-	Weather -	Personnel -	Notes-		
Area or Equipment	BMP	Spills	Storage & Containment Conditions	Storm water Condition	Follow Up Notes
Parking Lot and Admin	1, 12				
Pad & Ship Building Area	1, 12				
Oil Storage Area	1,7 11,12 14 SPCC Plan				
Dry docks 1 and 2	1,2 14 9-37				
Pier	1, 14, 17, 31				
Paint Booth Paint Storage and Blasting Booth Area	1,2,7,9 12,14				
Elec. Shop and Machine Shop	1, 12				
Hazardous Materials Storage	3-6, 10 14, 17 spcc				
Outfalls	12				
ASD Yard Sediment Traps	12,19, 34				
Fire Response System	SWPP Plan				
Boiler Tanks	SPCC Plan				
Vehicles	15,16, 30				
Response Gear	16, 18				
Diesel Tanks and Portable Tanks	SPCC Plan				

Note storm water color, sediments, odor, and sheen. Note condition and compatibility of stored chemicals. Note condition of containment systems. Note any inappropriate chemical or material contact with storm water. Note any spilled materials or threat of spilled materials. Note any flooding or

Unusual storm water flows. Note trash, debris, plastic, or wood scrap that needs to be cleaned up. Note proper labeling for hazardous materials. Note proper labels for stored hazardous wastes. Note proper containment for paint mixing and chemical handling.

- ❖ No blasting or painting pier side without specific permission.
- ❖ No washing down of spills are allowed. Dry dock must be swept prior to submerging (grit can be moved hydraulically to piles for cleanup).



**Appendix D**

**Vigor Alaska**

**Quarterly Visual Storm water Examination**



## Vigor Alaska Quarterly Visual Storm water Examination

Personnel	Discharge Volume	Date	Time	Hours from previous Rainfall	Weather	Duration	Precipitation	Estimated	
Location	Outfall SW-1 Upland Repair Pad	Outfall SW-2 HazMat, Blast Booth, & Warehouse	Outfall SW-3 West Fab Hall, Q hut, Fab Shop, Middle Pad	Outfall SW-4 East Fab Hall & East of Pad (includes City lot to east)	Outfall SW-5 South Fab Hall	Outfall SW-6 Metal laydown Area	Outfall SW-7 PL/Clity From Old AMHS Offices & Main Park Lot (gravel)	Outfall SW-8 Drydock-1	Pier From pier surface
Description									
Color									
Odor									
Clarity (cloudiness)									
Floating Solids									
Settled Solids									
Suspended Solids									
Foam									
Oil Sheen									



[illegible]

**QUARTERLY MAINTENANCE:** Oil Water Separator (SD-16) Inspected \_\_\_\_\_  
 Drain Fabric Inspected and Cleaned \_\_\_\_\_  
 Drain Sorbents Replaced \_\_\_\_\_  
 Drain Traps Inspected and Cleaned \_\_\_\_\_  
 Grit and dust swept from control areas \_\_\_\_\_

Control measures needing replacement.

### Probable sources of storm water contamination



## **Appendix F**

### **Storm Water Monitoring Plan**



# ***STORM WATER MONITORING PLAN***

**Vigor Alaska  
3801 Tongass Ave.  
Ketchikan, AK**

**Environmental Department  
September 2015**

**In Compliance With the NPDES Storm Water Multi-Sector General  
Permit for Industrial Activities**



## **Monitoring Methods**

This monitoring plan is designed to ensure that storm water discharges to receiving waters from this facility are in compliance with the APDES Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activities (MSGP). This plan coincides with, and is part of, the Storm Water Pollution Prevention Plan (SWPPP), enabling Vigor Alaska to implement the SWPPP guidelines and evaluate the facility's pollutant controls. The monitoring methods, sampling locations, sampling methods, and frequency of monitoring discussed in this plan meet the requirements set forth in the MSGP.

## **Records**

Records of all storm water monitoring information and copies of all reports shall be retained for a period of at least five years. All records kept pertaining to this plan will be on file in the Environmental Department files. These records include all annual site evaluation forms, records of visual observations, sampling results, and any other documentation pertaining to the Storm Water Monitoring Plan (SWMP).

## **Annual Comprehensive Site Compliance Evaluation**

Vigor Alaska Environmental Department representative shall conduct a comprehensive site compliance evaluation during each annual reporting period as described in the SWPPP. Evaluations shall be conducted within 8-16 months of each other. The SWPPP shall be revised, as appropriate, and the revisions implemented within 90 days of the evaluation. The SWPPP revisions and comprehensive site evaluation format are described in the SWPPP.

## **Quarterly Storm Water and Non-Storm Water Discharge Visual Observations**

On a quarterly basis, the Vigor Alaska Environmental Department personnel shall observe all drainage areas within their facilities for the presence of:

- Unauthorized non-storm water discharges. Unauthorized discharges to storm water systems that are not composed entirely of storm water.
- Authorized non-storm water discharges. Authorized discharges to the storm water systems that are not composed entirely of storm water.
- Storm water quality. Storm water discharges from the Vigor Alaska storm drains will be inspected and recorded for several water quality parameters (SWPPP Appendix D and E) as described in the SWPPP.

These visual observations shall occur during daylight hours and scheduled facility operating hours. Non storm water observations may be conducted on days with no storm water discharges to facilitate the accuracy of the observations. Quarterly observations shall be conducted during the following periods:

- January-March
- April-June
- July-September
- October-December

Quarterly observations shall be conducted within 6-18 weeks of each other. Visual observations shall document the presence of any discoloration, stains, odors, floating materials, etc., as well as the source of any discharge. Records shall be maintained and include the dates, locations observed, observations, and



actions taken. Appendix D of the SWPPP includes the quarterly form that ASD will use to record the observations. The quarterly inspections will include:

- Date and time
- Personnel and weather
- Storm duration, rainfall and rain volume
- Storm water color and odor
- Water clarity observations
- Solids and debris observations
- Foam or sheen observations
- Sources of suspected contaminants
- Quarterly maintenance of control features

Grab samples will be taken in day light hours. Samples will be approximately within the first 30 minutes, not to exceed one hour, of beginning of precipitation or snow runoff. Samples should be collected from a storm event that occurs at least 72 hours from the previous storm.

### **Other Storm Water Observations**

ASD Environmental Department personnel may also make additional periodic observations of yard conditions and storm water conditions at the drainage areas and industrial storage zones. Observations will normally be during storm water discharges or during industrial activities that may pose risks of impacted storm water.

Qualified ASD personnel may inspect the industrial equipment and industrial areas on an as needed basis or as often as a monthly basis. The monitoring areas are designated and recorded on the monitoring form (SWPPP Appendix E). The monitoring form also is used for tracking follow up procedures to ensure that appropriate actions are taken in response to the inspection.

Visual observations shall document the presence of any floating and suspended material, oil spills, storm water discoloration, and source of any pollutants. Records shall be maintained and include the dates, locations observed, observations, and actions taken.

### **Visual Observations and Sample Exceptions**

The Vigor Alaska Environmental Department personnel are not required to conduct visual observations during dangerous weather conditions or when storm water discharges begin after scheduled facility operating hours. The observation and sampling beginning time must comply with the General Permit specified conditions during facility operating hours



## **Appendix H**

### **MSGP Permit**



**Attachment E**  
**Notice of Intent and Permit Coverage Letter**

**Vigor Alaska Ketchikan**





THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of Environmental  
Conservation

DIVISION OF WATER  
Wastewater Discharge Authorization Program

555 Cordova St  
Anchorage, Alaska 99501-2617  
Main: 907.269.6285  
Fax: 907.334.2415

9/28/2015

Company: Vigor Alaska Ketchikan  
ATTN: Tammie L Wilson  
5555 N. Channel Ave.  
Portland OR 97217

Facility:  
Vigor Alaska Ketchikan  
3801 N. Tongass Ave  
Ketchikan AK 99901

Permit Number: AKR06AD26

This email/letter acknowledges that you have submitted a complete Notice of Intent form to be covered under the **APDES General Permit for Stormwater Discharges for Multi-Sector General Permit Activity (Multi-Sector General Permit)**. The Permittee is authorized to discharge storm water under the terms and conditions of this permit seven (7) calendar days after acknowledgement of receipt of the permittee's completed NOI is posted on ADEC's Storm Water Permit Search website: (<http://www.dec.state.ak.us/Applications/Water/WaterPermitSearch/Search.aspx>). Coverage under this permit begins seven-days from the "Date Issued" on the Water Permit Search website.

As stated above, this letter acknowledges receipt of a complete Notice of Intent. However, it is not an ADEC determination of the validity of the information you provided. Your eligibility for coverage under the Permit is based on the validity of the certification you provided. Your signature on the Notice of Intent certifies that you have read, understood, and are implementing all of the applicable requirements. An important aspect of this certification requires that you correctly determine whether you are eligible for coverage under this permit.

As you know, the Multi-Sector General Permit requires you to have developed and begun implementing a Stormwater Pollution Prevention Plan (SWPPP) and outlines important inspection and record keeping requirements. You must also comply with any additional location-specific requirements applicable to your state or tribal area. A copy of the Multi-Sector General Permit must be kept with your SWPPP. An electronic copy of the Permit and additional guidance materials can be viewed and downloaded at <http://www.dec.state.ak.us/water/wnpspc/stormwater/index.htm>.

For tracking purposes, the following number has been assigned to your Notice of Intent Form:  
AKR06AD26

If you have general questions regarding the stormwater program or your responsibilities under the Multi-Sector General Permit, please call William Ashton (907) 269-6283

Thank you for using the ADEC eNOI system.

May 2015



## Notice of Intent (NOI) For Storm Water Discharges Associated With Industrial Activity Under the APDES Multi-Sector General Permit

Submission of this completed Notice of Intent (NOI) constitutes notice that the operator identified in Section I of this form requests authorization to discharge pollutants to waters of the United States from the facility or site identified in Section III under Alaska's APDES Multi-Sector General Permit (MSGP) for industrial storm water. Submission of this NOI constitutes your notice to DEC that the facility identified in Section III of this form meets the eligibility conditions of Part 1.1 of the MSGP. Please read and make sure you comply with all eligibility requirements, including the requirement to prepare a storm water pollution prevention plan. Refer to the instructions at the end of this form to complete your NOI.

### Section I. Operator Information

Organization:

Vigor Alaska Ketchikan

Contact Person:

Russell Page

Mailing  
Address:

Street (PO Box):

3801 N. Tongass

City:

Ketchikan

State:

AK

Zip:

99901

Phone:

907-228-5306

Fax (optional):

Email:

russell.page@vigor.net

### Section II. Billing Contact Information

Organization:

Vigor Industrial, LLC

Contact Person:

Tammie L Wilson

Mailing  
Address:

Street (PO Box):

5555 N. Channel Ave.

City:

Portland

State:

OR

Zip:

97217

Phone:

971-352-8112

Fax (optional):

Email:

tammie.wilson@vigor.net

### Section III. Facility Information

Facility Name: Vigor Alaska Ketchikan

Have storm water discharges from your site been covered previously under an APDES or NPDES Permit? ☒ Yes ☐ Noa. If Yes, provide the Tracking Number. AKR05CD63b. If Yes, have you paid a Multi-Sector General Permit (MSGP) authorization fee for this calendar year? ☒ Yes ☐ No ☐ N/Ac. If No, was your facility in operation and discharging storm water prior to September 29, 2013? ☒ Yes ☐ No ☐ N/Ad. If No to "c", did your facility commence discharging after September 29, 2013 and before the effective date of this permit? ☐ Yes ☐ No ☐ N/A

Location Address:	Street:	Borough or similar government subdivision		
	3801 N. Tongass	Ketchikan Gateway		
	City:	State:	Zip:	
	Ketchikan	AK	99901	
	Latitude:	Longitude:	Determined By:	
	55.342222	-131.646111	<input type="checkbox"/> GPS <input type="checkbox"/> USGS Topographic Map <input checked="" type="checkbox"/> Other	
	If you used a USGS Topographic map, what was the scale?			

Estimated area of industrial activity at your site exposed to storm water: 16.5 (acres)Is this a federal facility? Yes ☐ No ☒

### Section IV. Discharge Information

Does your facility discharge into a Municipal Separate Storm Sewer System (MS4)? ☐ Yes ☒ No

If yes, name of the MS4 Operator:

**Receiving Water and Wetlands Information:** (if additional space is needed for this question, fill out Attachment 1.)

a. What is the name(s) of your receiving water(s) that receive storm water directly and/or through a MS4?  If your receiving water is impaired, then identify the name of the impaired segment, if applicable, in parenthesis following the receiving water name.	b. Are any of your discharges directly into any segment of an "impaired" water?		c. If you answered yes to question b, then answer the following three questions:				
	Yes	No	i. What pollutant(s) are causing the impairment?	ii. Are the pollutant(s) causing the impairment present in your discharge?		iii. Has the TMDL been completed for the pollutant(s) causing the impairment?	
				Yes	No	Yes	No
Tongass Narrows	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tongass Narrows	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Federal Effluent Limitation Guidelines and Sector-Specific Requirements

a. Are you requesting permit coverage for any storm water discharges subject to effluent limitation guidelines? ☐ Yes ☒ No

b. If yes, which effluent limitation guidelines apply to your storm water discharge?

40 CFR Part/Subpart	Eligible Discharges	Affected MSGP Sector	Check if applicable
Part 411, Subpart C	Runoff from material storage piles at cement manufacturing facilities.	E	<input type="checkbox"/>
Part 418, Subpart A	Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished products, by-products, or waste products (SIC 2874).	C	<input type="checkbox"/>
Part 423	Coal pile runoff at steam electric generating facilities.	O	<input type="checkbox"/>
Part 429, Subpart I	Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas.	A	<input type="checkbox"/>
Part 436, Subpart B, C, or D	Mine dewatering discharges at crushed stone mines, construction sand and gravel mines, or industrial sand mines.	J	<input type="checkbox"/>
Part 443, Subpart A	Runoff from asphalt emulsion facilities.	D	<input type="checkbox"/>
Part 445, Subparts A & B	Runoff from hazardous waste and non-hazardous waste landfills.	K, L	<input type="checkbox"/>
Part 449, Subpart A	Runoff from Air Transportation	S	<input type="checkbox"/>

If you are a Sector S (Air Transportation) facility, do you anticipate using more than 100,000 gallons of glycol-based deicing/anti-icing chemicals and/or 100 tons or more of urea on an average annual basis? ☐ Yes ☒ No

Identify the 4-digit Standard Industrial Classification (SIC) that best represents the products produced or services rendered for which your facility is primarily engaged, as defined in MSGP: **3731**

Identify the applicable sector(s) and subsector(s) of industrial activity, including co-located industrial activity, for which you are requesting permit coverage:

Sector	Subsector	Sector	Subsector	Sector	Subsector
<b>R -</b>	<b>R1</b>				

Is your site presently inactive or unstaffed? ☐ Yes ☒ No

a. If Yes, is your site expected to be inactive and unstaffed for the entire permit term? ☐ Yes ☐ No

b. If No to "a", then indicate the length of time that you expect your facility to be inactive and unstaffed:

### Section V. Storm Water Pollution Prevention Plan (SWPPP) Contact Information

SWPPP Contact Name:  
**Tammie L Wilson**

Email:  
**tammie.wilson@vigor.net**

Phone:  
**971-352-8112**

URL of SWPPP(if applicable):

### Section VIII. Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Tammie L Wilson

Printed Name

Stormwater Manager

Title

Signature Page Signed by: Russell Page

Signature

09/28/2015

Date

Vigor Industrial, LLC

Organization

tammie.wilson@vigor.net

Email

### Section IX. NOI Preparer (Complete if NOI was prepared by someone other than the certifier.)

Tammie L Wilson

Printed Name

Stormwater Manager

Title

Vigor Industrial, LLC

Organization

971-352-8112

Phone

tammie.wilson@vigor.net

Email

### Section X. Document Attachments

Documents attached with this application:

2015SWPPP\_VAK.pdf



**Attachment 1. (Fill in as necessary if more space is required for Receiving water and Wetlands Information.)**

[illegible]



**Attachment F**  
**ADEC June 12, 2013 Inspection Report**

**Vigor Alaska Ketchikan**





THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNEILL

Department of Environmental  
Conservation

DIVISION OF WATER  
Compliance and Enforcement

110 Willoughby Avenue Suite 303  
P.O. Box 111800  
Juneau, Alaska 99811-1800  
Main: 907-465-5336  
Fax: 907-465-5274

September 23, 2013

**CERTIFIED MAIL 70031680000429062842**

**RETURN RECEIPT REQUESTED**

Gordon Erickson  
James Bateman  
3801 Tongass Avenue  
Ketchikan, AK 99901

**Re: Alaska Pollutant Discharge Elimination System (APDES) Inspection Report for Alaska Ship and Drydock, LLC. AKR05CD63**

Dear Mr. Erickson and Mr. Bateman,

Included is the APDES inspection report from the inspection that occurred on June 12, 2013 at Alaska Ship and Drydock in Ketchikan, AK.

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Weitz".

Jill Weitz  
Compliance and Enforcement Program  
[jill.weitz@alaska.gov](mailto:jill.weitz@alaska.gov)  
(907).465.5336



# APDES INSPECTION REPORT

Alaska Department of Environmental Conservation

Division of Water

410 Willoughby Ave, Juneau, AK 99811

ADEC APDES Inspection  
Form Last updated (4/08)

Jill M. Weitz  
Phone: (907) 465-5336  
Fax: (907) 465-5274

## Section A: General Data

Inspection Date	Permit #	Borough	Receiving Waters	Weather	Facility Type
6/12/13	AKR05CD63	Ketchikan	Tongass Narrows	Light rain, 55°	Industrial
Discharges to: Surface Water <input checked="" type="checkbox"/> Ground Water <input type="checkbox"/>				UNANNOUNCED Inspection	

## Section B: Facility Data

<b>Name and Location of Site/ Facility Inspected</b>		<b>Entry Time</b>	<b>Permit Effective Date</b>												
Alaska Ship and Drydock, LLC. (ASD) 3801 Tongass Avenue Ketchikan, AK 99901		12:35 pm	June 29, 2008												
<b>Loc: 55°21.24 N</b>		<b>Exit Time</b>	<b>Permit Expiration Date</b>												
<b>Long: 131°41.49 W</b>		3:45 pm	September 29, 2013												
<b>Source: NOI/Google Earth</b>															
<b>On-Site Representative</b>		<b>Additional Participants:</b>													
James Bateman ASD Safety and Environmental Manager (as of 11 days)		Troy Tacker, ASD Yard/Services Superintendant													
<b>Responsible Official(s):</b>															
Adam Beck ASD President 3801 Tongass Avenue Ketchikan, AK 99901	Gordon Erickson Environmental Director 3801 Tongass Avenue Ketchikan, AK 99901 gordone@akship.com														
Phone: (907) 228-5300	Phone: (907) 225-7199														
		<table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td>Samples Taken?</td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Photos Taken?</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Analytical Results?</td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> </table>			Yes	No	Samples Taken?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Photos Taken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical Results?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Yes	No													
Samples Taken?	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
Photos Taken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>													
Analytical Results?	<input type="checkbox"/>	<input checked="" type="checkbox"/>													

## Section C: Findings/Comments

### BACKGROUND

Alaska Ship and Drydock, LLC. (ASD) is located on the Pacific coast, west of Tongass Avenue in Ketchikan, Alaska. The facility is adjacent to the Tongass Narrows in Southeast Alaska on approximately seven acres of land and 1,600 feet of shoreline. And additional five acres of land east of the shipyard covers a future metal lay down storage area. ASD utilizes one pier and two drydocks (one drydock constructed in 2009). Asphalt pavement surrounds the ASD administrative buildings, parking lot, northwest portion of the property, and around the new machine shop. Six storm drains convey stormwater to the north outfall SW1, and nine additional storm drains convey to outfall SW2.

Alaska Industrial Development and Export Authority (AIDEA) is the owner and lessor of the property. ASD operates and manages this shipyard under an agreement with AIDEA.

### REGULATORY STATUS/ COMPLIANCE HISTORY

ASD was authorized to operate under the Alaska Pollutant Discharge Elimination System (APDES) Multi-Sector General Permit, AKR05CD63, on May 27, 2009. This was the first APDES inspection at ASD.

### FIELD INSPECTION

Inspector Weitz from the Alaska Department of Environmental Conservation (DEC) arrived at this facility at 12:35 pm on June 12, 2013. Inspector Weitz was greeted by James (Jim) Bateman, the new Safety and Environmental Manager for



ASD. Inspector Weitz provided Mr. Bateman with credentials and explained the objective of the APDES inspection. Mr. Bateman introduced Troy Tacker, and the two of them provided facility files which were reviewed at that time. Following the facility file review, Mr. Bateman and Mr. Tacker escorted Inspector Weitz around the facility, beginning at the Upland Repair Berth area, where the oil and water separator is located (Photo 4). The group then continued onto Drydock 2 (Photo 1), which has containment sumps at each end. Drydock 1 also has containment sumps at each end (Photo 3). From Drydock 1, the group proceeded to the outdoor storage area of the facility; multiple hazardous substances were not in secondary containment (Photos 5, 6, 8, 9). The group continued around the storage areas, only noting two more areas of concern: the shop where the blasting occurs seems to track grit out from the door; Inspector Weitz suggested cleaning up of this area and general housekeeping around the storage yard (Photos 10, 11). Inspector Weitz explained the significance of secondary containment and following this inspection, Mr. Bateman immediately began implementation of proper storage of all materials on-site (photographs sent via email).

#### RECORDS REVIEW

All facility files were up to date and complete.

#### Section D: Compliance/Recommendations

##### ADMINISTRATIVE VIOLATIONS

None noted.

##### POTENTIAL WATER QUALITY VIOLATIONS

1. Failure to adhere to Section 2.1.2.4 of the Multi-Sector General Permit, stating that permittees must minimize potential for leaks, spills, and other releases (proper secondary containment).

#### Section E: Appendices

Signature only acknowledges receipt of this report. Inspection report given to:

Inspector  
Division of Water/Water Quality Compliance

 9/23/13  
Date

Company (if applicable):

Date



PHOTO 1: WALKING TO DRYDOCK 2



PHOTO 2: STORM DRAINS FROM SHIP FAB. BUILDING TO DRYDOCK 2 AREA



PHOTO 3: DRYDOCK 1

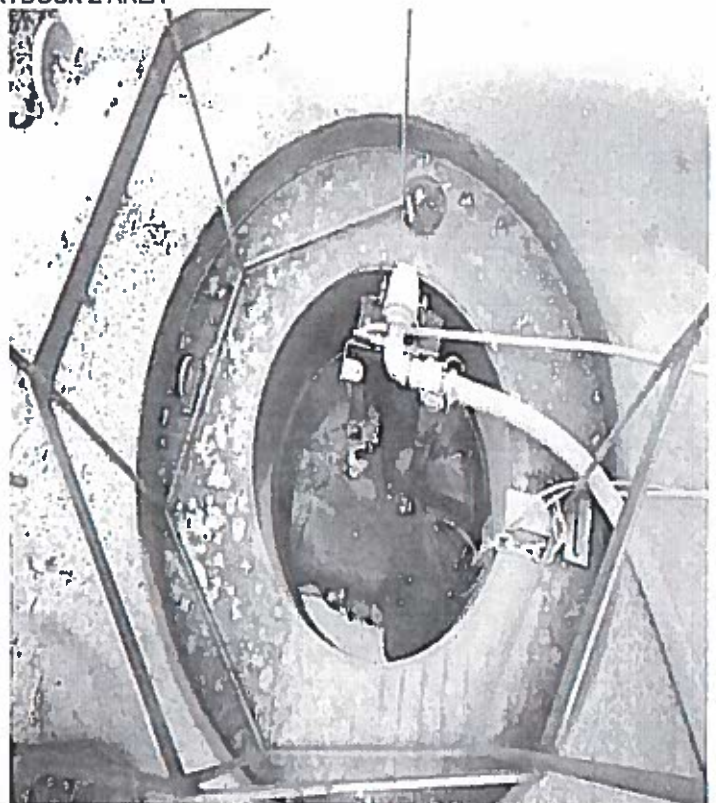


PHOTO 4: OIL WATER SEPARATOR





PHOTO 5: FILM FORMING FLUOROPROTEIN ALCOHOL  
STORED OVER STORAGE DRAIN

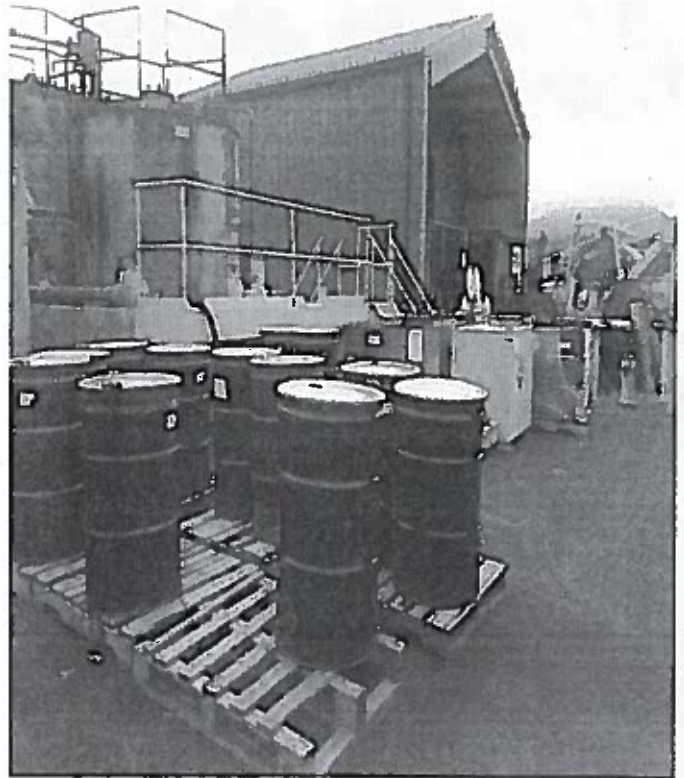


PHOTO 6: OIL DRUMS OUT OF SECONDARY CONTAINMENT

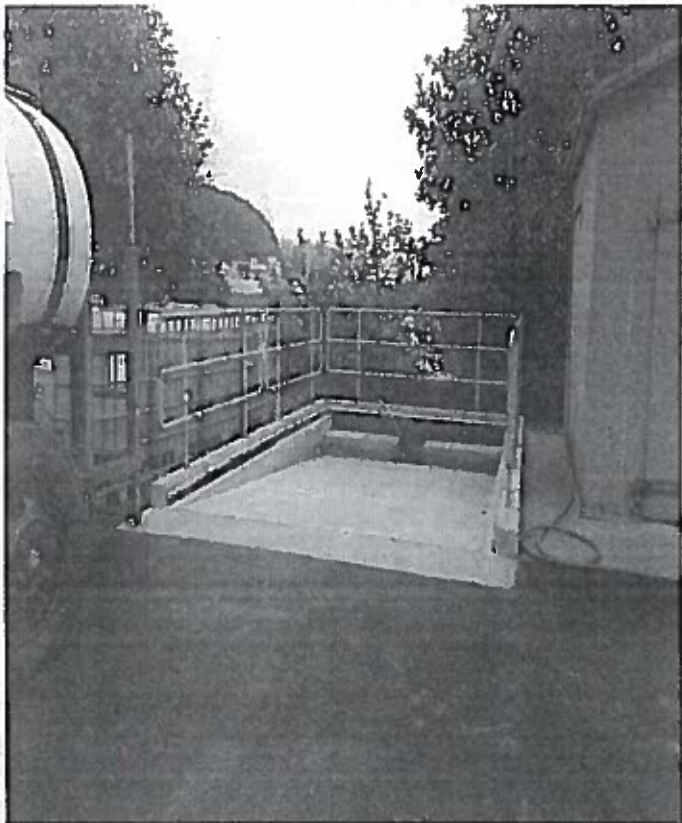


PHOTO 7: OIL WATER SEPARATOR



PHOTO 8: OIL DRUMS OUT OF SECONDARY CONTAINMENT

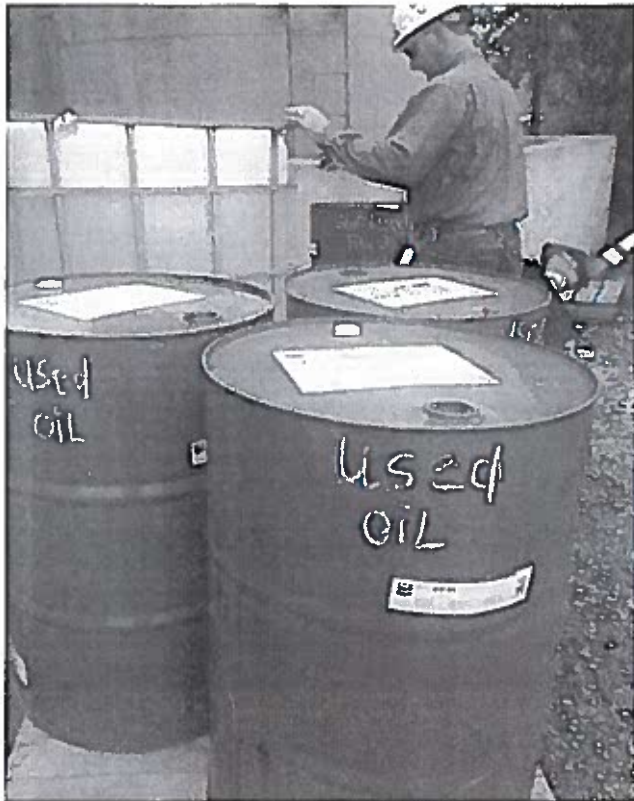


PHOTO 9: OIL DRUMS OUT OF SECONDARY CONTAINMENT



PHOTO 10: BLASTING GRIT



PHOTO 11: DEBRIS OUTSIDE OF SHIP FAB. BUILDING

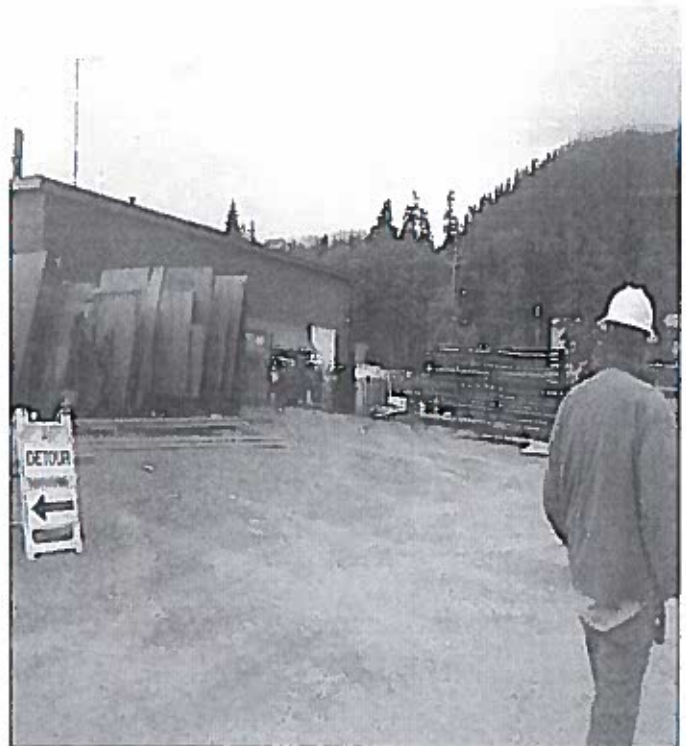


PHOTO 12: STEEL LAY-DOWN YARD



# **Attachment G**

## **Visual Assessment Documentation Example**

**Vigor Alaska Ketchikan**



SB 8/29/17  
V. J. Alaska  
K. H. Alaska

## ALASKA SHIP & DRYDOCK, INC

### Quarterly Visual Stormwater Examination

Personnel <u>R. Page</u>		Date <u>8-27-17</u>		Time <u>2:04pm</u>		Weather <u>Rain</u>		Duration <u>3</u>		Precipitation <u>heavy</u>		Estimated discharge Volume _____	
Hours from previous Rainfall <u>12 hours</u>													
Location	Outfall SW-1	Outfall SW-2	Outfall SW-3	Outfall SW-4	Outfall SW-5	Outfall SW-6	Outfall SW-PL/City	Outfall SW-7	Outfall SW-8	Pier			
	Upland Repair Pad	HazMat, Blast Booth, & Warehouse	West Fab Hall, Q hut, Fab Shop, Middle Pad	East Fab Hall & East of Pad (includes City lot to east)	South Fab Hall	Metal laydown Area	From Old AMHS Offices & Main Park Lot (gravel)	Drydock-1	Drydock-2	From pier surface			
Description													
Color	Tan Cloudy	Tan Cloudy	Clear	Tan Cloudy	Clear	Clear	Clear	Tan Cloudy	Clear	Tan Cloudy			
Odor	No	No	No	No	No	No	No	No	No	No			
Clarity (cloudiness)	Cloudy	Cloudy	Clear	Cloudy	Clear	Clear	Clear	Cloudy	Clear	Cloudy			
Floating Solids	No	No	No	No	No	No	No	No	No	No			
Settled Solids	No	No	No	No	No	No	No	No	No	No			
Suspended Solids	No	No	No	No	No	No	No	No	No	No			
Foam	No	No	No	No	No	No	No	No	No	No			
Oil Sheen	No	No	No	No	No	No	No	No	No	No			
Debris	No	No	No	No	No	No	No	No	No	No			

Grab sample must be taken in daylight hours. Sample must be approximately within the first 30 minutes (not to exceed one hour) of beginning of precipitation or snow runoff. Samples should be collected from a storm event that occurs at least 72 hours from the previous storm. Maintain results in the SWPPP. The winter observations must assess snowmelt discharges.

**QUARTERLY MAINTENANCE:** Oil Water Separator (SD-16) Inspected \_\_\_\_\_ Drain Fabric Inspected and Cleaned \_\_\_\_\_  
 Drain Sorbents Replaced \_\_\_\_\_ Drain Traps Inspected and Cleaned \_\_\_\_\_ Grit and dust swept from control areas \_\_\_\_\_  
 Unidentified discharges \_\_\_\_\_  
 Control measures needing replacement \_\_\_\_\_  
 Probable sources of stormwater contamination \_\_\_\_\_



